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ABSTRACT

This guidebook provides maintenance and operations guidelines for managing General Services Administration (GSA) child care centers within the same standards and level of a GSA operated facility. Areas covered address cleaning standards and guidelines; equipment funding and inventory; maintenance of living environments and problem areas; checklists for school safety, health, and security; designing and remodeling; and playground maintenance. Also covered are the roles and responsibilities of child care providers, and comments on operation costs and quality. Final sections address issues on fundraising such as legal considerations and steps to fundraising success. (GR)

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ED 440 524

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CHILD CARE OPERATIONS CENTER OF EXPERTISE

Facility Management Child Care Resource Book

July 1999

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fundraising

TRIBLE AMENDMENT

Authority allowing Federal agencies to establish child care centers is provided under 40 U.S.C 490b, commonly known as the "Trible Amendment." It states:

SEC. 139. (a) Notwithstanding section 101(i) and section 102(c) of this joint resolution, and notwithstanding any provision of H.R. 3036, if any individual or entity which provides or proposes to provide child care services for Federal employees applies to the officer or agency of the United States charged with the allotment of space in the Federal Buildings in the community or district in which such individual or entity provides or proposes to provide such services, such officer or agency may allot space in such a building to such individual or entity if -

(1) such space is available:

(2) such officer or agency determines that such space will be used to provide child care services to a group of individuals of whom at least 50 percent are Federal employees; and

(3) such officer or agency determines that such individual or entity will give priority for available child care services in such space to Federal employees.

(b)(1) if an officer or agency allots space to an individual or entity under subsection (a), such space may be provided to such individual or entity without charge for rent or services.

(2) If there is an agreement for the payment of costs associated with the provision of space allotted under subsection (a) or services provided in connection with such space, nothing in title 31, United States Code, or any other provision of law, shall be construed to prohibit or restrict payment by reimbursement to the miscellaneous receipts or other appropriate account of the Treasury.

(3) For the purpose of this section, the term "services" includes the providing of lighting, heating, cooling, electricity, office furniture, office machines and equipment, telephone service (including installation of lines and equipment and other expenses associated with telephone service), and security systems (including installation and other expenses associated with security systems).

SEC. 528. Section 616 of the Act of December 22, 1987 (40 U.S.C. 490b) is amended-

(1) by amending subsection (a)(2) to read as follows:

'(2) such officer or agency determines that such space will be used to provide child care services to children of whom at least 50 percent have one parent or guardian who is employed by the Federal Government; and';

(2) by amending subsection (b)(3) to read as follows:

'(3) For the purpose of this subsection, the term 'services' includes the providing of lighting, heating, cooling, electricity, office furniture, office machines and equipment, classroom furnishings and equipment, kitchen appliances, playground equipment, telephone service (including installation of lines and equipment and other expenses associated with telephone services), and security systems (including installation and other expenses associated with security systems), including replacement equipment, as needed.';

(3) by redesignating subsection (b)(3), as amended by paragraph (2), as subsection (b)(4), and inserting after subsection (b)(2) the following:

'(3) If an agency has a child care facility in its space, or is a sponsoring agency for a child care facility in other Federal or leased space, the agency or the General Services Administration may pay accreditation fees, including renewal fees, for that center to be accredited by a nationally recognized early-childhood professional organization, and travel and per diem expenses for attendance by representatives of the center at the annual General Services Administration child care conference.'; and

(4) by adding at the end the following:

'(c) Through the General Services Administration's licensing agreements, the Administrator of General Services shall provide guidance, assistance, and oversight to Federal agencies for the development of child care centers to promote the provision of economical and effective child care for Federal workers.

'(d) If a Federal agency has a child care facility in its space, or is a sponsoring agency for a child care facility in other Federal or leased space, the agency or the General Services Administration may enter into a consortium with one or more private entities under which such private entities would assist in defraying the costs associated with the salaries and benefits provided for any personnel providing services at such facility.'.

SEC. 529. Section 532 of the Act of November 5, 1991 (104 Stat. 1470; Public Law 100-509), is amended-

(1) by inserting "(a)" immediately before the first sentence inside the quotation marks; and

(2) by adding before the quotation marks at the end the following new subsection:

'(b) The Internal Revenue Service may use the competitive procedures or procedures other than competitive procedures to procure the services of attorneys for use in litigating actions under the Internal Revenue Code to which a foreign-controlled corporation is a party. The Internal Revenue Service need not provide any written justification for the use of procedures other than competitive procedures when procuring attorney services for such cases and need not furnish

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for publication in the Commerce Business Daily or otherwise any notice of solicitation or synopsis with respect to such procurement.'.

SEC. 530. (a) None of the funds made available by this Act may be used to implement, administer, enforce, or otherwise carry out any change in the terms or conditions governing benefits under…

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MEMORANDUM FOR ASSISTANT REGIONAL ADMINISTRATORS
FOR PUBLIC BUILDINGS SERVICE
2P, 3P, 4P, 5P, 6P, 7P, 8P, 9P, 10P, WP

FROM: P. GERALD TRACKER (Signed) David L. Bibb
COMMISSIONER - P
SUBJECT: Child Care Center Policy Guidance

The basic authority governing child care services for Federal employees in Federal Buildings is contained in 40 U.S.C. 490b. GSA is authorized to provide space and services to child care providers without charge, if all criteria outlined in 40 U.S.C 490b are met.

Policy guidance on child care centers, including the funding responsibilities of GSA and the sponsoring agencies, is contained in 41 CFR, Part 101-17, Assignment and Utilization of Space (Temporary Regulation D-76), published August 26, 1991. It states that the agencies sponsoring the child care centers will pay Rent to GSA for child care space and related services, and reimburse GSA for above-standard requirements.

The fiscal year 1993 Appropriations Act for GSA (Public Law 102-393) clarified the definition of "services" for child care centers to include: "...the providing of lighting, heating, cooling, electricity, office furniture, office machines and equipment, classroom furnishings and equipment, kitchen appliances, playground equipment, telephone service (including installation of lines and equipment and other expenses associated with telephone services), and security systems (including installation and other expenses associated with security systems), including replacement equipment, as needed.. Equipment also includes, but is not limited to, such items as cots, cribs, high chairs, changing tables, and tables and chairs.

Effective immediately, this memorandum serves as your authority to use funds from Budget Activity 61 to purchase equipment for the operation of child care centers. Costs are to be charged to A75.

PBS will not provide toys, incidental items such as dishes, disposable or consumable items such as food, etc. The child care provider will acknowledge receipt in writing of all items of equipment and other Government property funded and provided by PBS. The child care

provider must provide routine care of the equipment and property. The inventory will be subject to periodic review and verification by PBS.

All such equipment provided by PBS will remain the property of the Government. PBS is further responsible for maintenance and replacement of the child care center equipment. The maintenance costs shall be charged to the appropriate A40 function code series.

41 CFR, Part 101-17 (Assignment and Utilization of Space) will be amended to reflect the change in funding responsibilities for child care centers. If you have any questions, please have a member of your staff contact Kathie Bullock, Financial Management Division, on (202) 501-3877.

cc: Official/Reading File - P. PF, PFF, PFFM, PFB PFOM, PQ, PM, AS, LR

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PQ	_____	AS	_____
PM	_____	LR	_____

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PLACE CENTER

SPECIFIC

AGREEMENTS

HERE

Delegations

Delegated agencies are required to maintain child care facilities to the same standards and level of a GSA operated facility.

cleaning

Clinical cleaning is the base line. You can adjust it to make sure the place is clean. Infant areas should be going to shoeless environments. Without shoeless environments you're probably looking at monthly carpet shampoo in infant and toddler areas. Child care staff should be cleaning the kids toys and shelves. Child care staff should be cleaning the inside of appliances. Child care staff should be cleaning animal cages. Questions on cleaning or health issues can be directed to the RCCC or use the handbook "Caring for our Children, National Health and Safety Performance Standards: Guidelines for Out of Home Child Care Programs" written by the American Public Health Association and American academy of Pediatrics.

hint:

Sand and water tables and everything that goes in them: bubbles, sand, flour, oatmeal, oil, rice etc. are a mess and they often leave a mess. This type of play is important for children at this age. We do not want to eliminate this activity. Talk with the director about problems. Children and staff should be doing a certain amount of immediate clean up. If they need a small broom, mop or dustbuster let's make sure they have them. One other idea is to have the activity table on a large mat that can contain some of the loose materials.

JUN 26 1990

MEMORANDUM FOR ASSISTANT REGIONAL ADMINISTRATORS
FOR PUBLIC BUILDINGS SERVICE - 2P, 3P, 4P, 5P, 6P, 7P, 9P, WP

FROM: THOMAS H. WALKER
ASSISTANT COMMISSIONER
FOR REAL PROPERTY MANAGEMENT
AND SAFETY - PM

SUBJECT: Cleaning of Child Care Centers

In a recent memorandum about child care centers, the Commissioner, Public Buildings Service, reiterated the importance of providing a safe and healthful environment for our clients in these centers. Towards this goal, please ensure that all child care providers are cognizant of the cleaning requirements for their centers and of the person to contact in the Buildings Manager s Office if cleaning deficiencies arise.

It may be helpful to provide a copy of the cleaning standards or the contract specifications, as applicable.

To make it easy for child care providers to understand the cleaning services they are to receive, I have attached a checklist to be provided to each center. Since the checklist depicts only minimum cleaning standards, it should be tailored to fit the unique cleaning requirements of each child care center. Also attached is a listing of the centers located in GSA controlled space.

Questions concerning the cleaning of child care centers should be directed to Ms. Debra Yap, Chief, Ms. Shirley Hodrick, or Mr. Don Meadows, Buildings Services Branch (PMFS), on FTS 241-1446.

Attachments

cc:
Regional Administrators - 1A, 2A, 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A, WA
Regional Directors - 2PM, 3PM, 4PM, 5PM, 6PM, 7PM, 9PM, WPB

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CHILD CARE CENTER CLEANING STANDARDS CHECKLIST					
	TASK	**FREQUENCY**	**SAT**	**UNSAT**	
A.	**ROOM CLEANING:**	**Daily**			
1	Empty waste baskets				
2	Dust horizontal surfaces of all adult furniture building ledges				
3	Clean glass table desk tops				
4	Clean sinks and mirrors supply paper towels and soap				
5	Sweep and mop or scrub floor				
6	Thoroughly vacuum all carpet				
7	Spot clean carpet to remove spots				
8	Spot dean walls windows and view panels and mirrors				
B.	**TOILET CLEANING:**	**Daily**			
1	Sweep and wet mop or scrub using a cleaner-disinfectant				
2	Clean all surfaces and fixtures to include mirrors waste receptacles wall surfaces and dispensers utilizing a cleaner disinfectant				
3	Empty waste receptacles service towels soap and toilet paper				
C.	**SOILED DIAPERS RECEPTACLE**	**2X Daily**			
1	Remove and seal plastic bags containing soiled diapers to designated area				
D.	**POLICE:**	**Daily**			
1	Remove trash clean drinking fountains and clean door glass to remove fingerprints smudges etc.				
2	Remove trash from out door play area				
E.	**Office Space**	**Weekly**			
1	Dust vertical and under surfaces of furniture (knee wells chair rung table leg etc.)				
F.	**Floor Maintenance:**	**Weekly**			
1	Damp mop and spray buff all hard and resilient floors				
G.	**Glass & Wall Surfaces:**	**Monthly**			
1	Damp wipe both sides of glass in				

CHILD CARE CENTER CLEANING STANDARDS CHECKLIST					
	TASK	**FREQUENCY**	**SAT**	**UNSAT**	
	doors view windows partitions end book cases and any other glass within 70" of the floor				
2	Spot clean wall surfaces				
H.	**High Clean**	**Quarterly**			
1	Dusting or vacuuming all surfaces approx. 70" or more from the floor.				
I.	**Carpet Cleaning**	**Quarterly**			
1	Shampoo or dry clean all carpet. Note: Operation shall be scheduled on week ends to allow for thorough drying.				
J.	**Wash Walls**	**Annually**			
1	Wash walls using a germicidal solution as prescribed by COR.				
K.	**Strip and Refinish**	**Annually**			
1	Strip and refinish bare floor area using approved methods and chemicals.				
	CHILD CARE CLEANING ACCOMPLISHED BY THE PROVIDER				
	You can expect the child care staff to clean the toys and childrens'				
	Furniture. While an exact frequency is not prescribed if you find				
	Things dirty you can ask them to clean them.				
	The staff is also responsible for cleaning the kitchen appliances				
	Interiors. It would be expected that janitors would wipe down the				
	frig fronts if you have commercial equipment.				

equipment

The Building manager's office or the RCCC does most of the equipment purchasing for the center. Always coordinate with your RCCC before purchasing equipment. The child care directors should make their needs known to the RCCC. GSA buys large and durable equipment, we do not buy toys. The field office is the accountable property manager. You should have an inventory.

You will from time to time dispose of property. Most of it will be used up by the time the center asks you to get rid of it. You can dispose of it and make note of that on the equipment list. Much of the equipment has a low per item dollar value.

The equipment belongs to GSA, we repair and replace it. If you have commercial kitchen equipment you may want to get service contracts on appliances or it may be more cost effective to handle repairs on a breakdown basis. If you know something is going bad make sure the RCCC knows because they submit the equipment budget.

Telephones, lines, faxes, and copiers are provided by GSA. Standard level service for the child care center is to have 2 voice lines, one fax line, and one data line. They need long distance capability. The cost and billing is usually handled as part of the field office administrative expenses. Copiers are either purchased outright for the center or, if economical and practical, the child care center may have access to a copier in a GSA office or be on a GSA per copy contract.

Playground equipment is maintained by the field office. An annual playground check by a local professional is a good idea, or you can use the safety checklist in Chapter 6, and the Consumer Product Safety Commission publication "Handbook for Public Playground Safety" to conduct your own inspection. This check can identify any structural problems or entrapment hazards. Playground maintenance can also be built into your maintenance contract.

Child care equipment is purchased using the A75 account as directed by the RCCC. Each field office does not have an A75 allowance. Building repairs should be charged the appropriate A46 account.

maintenance

living environments:

The difference between a good environment for kids and "trashing " your building is a matter of attitude. The kids come first in the child care center. Get down on the floor once and look around, imagine you are going to be here for 10 hours a day, all year long. What does it look like down here? How does it feel? How does it smell?

Good teachers will be constantly changing the environment. The building manager's job is to help the teachers make these changes easily and safely. Teachers will want to hang tents and banners from the ceiling; help them by having hooks available. They will want to use the walls; help them by using finishes that will hold pictures, use map rails, put up bulletin boards, suggest sticky tack instead of tape. They will put tape on the floor, make sure carpet is good enough quality to hold up to tape on the floor. They will want to chalk the walls and sidewalks on the playground. They will want water in the playground. Try to be accommodating to their needs - everything they are doing is to stimulate the development of the children. If you find the carpet is being ruined because of eating, or play dough or painting on the carpet area, talk to the director about why they are doing these activities on the carpet. It is not unreasonable to expect them to do messy activities on tile. More tile with throw rugs is better than too much carpet in a center.

broken window syndrome:

The place will start to look run down quickly if you don't keep up with minor repair. It is reasonable to expect child care staff to do their part. It is not reasonable to expect the space to hold up to office standards. If walls are getting beaten up try and figure out why, is it because they are dragging cots into them. Rocking chairs can cause problems, but removing the chairs is not the answer. Maybe a different kind of chair, or a high wall baseboard will relieve the problem. There may be more than one solution to maintenance problems. Center repairs should be accomplished using building funds. Painting and choosing colors should be checked through the RCCC. Too much color is chaos. We use less color in the centers because more color is brought into the space by the children, their toys and their art work.

adhesives and finishes:

Extra attention must be paid to adhesives, glues and finishes used in building repairs. Allow enough time or choose a different material if "gassing off" is necessary. Non toxic materials must be used.

tried and true solutions:

carpet tiles: choose speckled and flecked tiles, solids look worn and dirty faster

walls:

- a multi-spec paint is effective where you would use vinyl. It repairs easier than vinyl and washes and wears great. (occupied centers may not be able to wait the "gassing off" period for this product)
- bathrooms should be ceramic on the water wall, opposing walls can be vinyl or paint
- build up a padded wall base at least 24" in multi purpose rooms, this space is used for bikes and balls and the walls soon get beat up. Cover this base with carpet or sound soak.
- sound soak or carpet is not the best choice for classroom walls
- paint should be glossy in bath and kitchen areas but not through out the space
- bulletin boards and map rails should be installed at kid height
- wall will need re-painted on a minimum 3 year schedule.

grills: low or floor mounted grills should be steel - the kids get into and bend aluminum ones. Cover grills with net or screen to eliminate kids putting puzzles pieces, crayons etc. into the grills.

Paint: Paint must be non-toxic with 200 grams/liter of VOC or less. The paint must comply with GSA Federal Specification TT-P-2846 which requires that paint contain a minimum of 50% post consumer waste paint taken from community collections. In addition, it must be lead and chromate free as defined by Department of Housing and Urban Development guidelines and must not contain any EPA 17 chemicals. GSA offers such environmentally sensitive paint. More information

is available from GSA's Paints and Chemicals Center at 1-800-241-RAIN (7246) or *GSA Advantage!* at http://www.gsa.gov. The email address is paintschemctr.auburn@gsa.gov.

safety

Safety is everyone's business. In one center the teachers created a hanging shelf for the record player; very clever and very dangerous because it was suspended from the ceiling grid. Notice these things and help accommodate their needs in a safe manner.

Facility safety has always been a concern, but especially since the Oklahoma City tragedy everyone is looking very carefully at the safety of the buildings and centers. One important and real safety precaution is the Occupant Emergency Plan for evacuation of the building/center. Make sure the center is incorporated into the OEP. Use and train volunteers to help evacuate the center. Centers are required by state licensing to conduct a practice evacuation on a monthly basis. Observe these drills and make sure they are conducting them within the allotted time frame. If actual alarms are not used for monthly drills, provide the center with a tape recording of the actual fire alarm so they can get used to it. Make sure the alarm can be heard on the playground. Make sure the designated paths of evacuation routes are cleared of all obstacles year round (including snow and ice).

Use the safety checklist provided in this chapter when you walk through the center and outside playground.

Your Safety personnel will provide you information on environmental hazards that need checked. Most centers have been tested and cleared on lead in paint and water and also tested for radon. The results should be available and copies posted in the RCCC's child care center files.

There are numerous safety products available, such as door guards and corner guards. Talk to your RCCC if you think you have a potential problem area.

CHILD CARE CENTER
FIRE & SAFETY INSPECTION SHEET

NAME OF CENTER: _____

NUMBER OF CHILDREN ON DAY OF INSPECTION _____

ITEM	YES	NO	N/A
In the child care center are corridors, aisles, passageways and doors which lead to the exits clear and unobstructed?			
Are the exit doors from the child care Center in good working condition?			
Are the child care center's exit discharges (e.g. building lobby, side walks etc.) clear and unobstructed?			
Are exit signs within the child care center properly located?			
Are the exit signs within the child care center unobstructed?			
In the child care center are corridors, aisles and passageways which lead to the exits illuminated?			
Are the exit signs within the center illuminated?			
Are the portable fire extinguishers accessible?			
Have the portable fire extinguishers been properly maintained and inspected?			
Are instructions posted on the manual operation of fire protection systems for kitchen equipment?			
Is the child care center's evacuation plan available and up to date?			
Are the evacuation procedures posted within each child care activity room?			
Are fire drills conducted monthly?			
Is documentation on fife within the center for each monthly fire drill?			
Is the child care staff properly trained in the evacuation procedure?			
Is the fire alarm system tested routinely?			
Are the fire alarm pull stations within/near the child care center accessible?			
Are the sprinkler heads clean, unpainted and unobstructed?			
Do the sprinkler heads have adequate clearance (18 inches)?			
Are the sprinkler components (e.g. inspectors test, sprinkler valves, etc.) properly identified?			
Is the sprinkler system inspected and tested routinely?			
Are the entrance doors to mechanical, equipment, and hazardous areas inside the child care center properly labeled?			
Are the electrical outlets showing signs of arching or disrepair?			
Are electrical outlet cover plates in place?			
Have the unused electrical outlets been provided with shock stops safety plugs?			
Have operable windows been protected to prevent climbing?			
If screened, have the screens been secured?			
Are cords on window coverings (blinds/curtains) either not looped or held with secure tie down devices?			
Noticeable odors are not prevalent within the center?			
Noticeable tripping hazards are not within the center?			
Unauthorized personal electrical appliances are not within the center?			
Portable electrical fans/space heaters are not in the center?			
Extension cords and Dower strips are not being used within the center?			

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ITEM	YES	NO	N/A
Are all electrical outlets child proofed?			
Is the emergency lighting in the corridors, aisles and passageways in good working condition?			
Are supplies within the center properly stored (bleach bottles)?			
Are two first aid kits available within the center?			
Are two first aid kits properly stocked with first aid supplies?			
Are security measures used properly? (doors locked)			
Are storage areas neatly maintained?			
Is the government provided equipment clean and in good repair?			
Are there mats under indoor climbing equipment?			
Does water temperature not exceed 110 degrees in children's areas?			
Are there are any sharp edges on building fixtures or equipment?			
Are there any exposed nails, bolts, screws or pipes?			
Are there any missing handles, or pieces?			

OUTSIDE PLAY AREA

ITEM	YES	NO	N/A
Play area surrounded by secured fence?			
Fence in good condition?			
Outside area clean and well landscaped?			
Play area free of glass, needles, garbage?			
Play area free of trip hazards?			
Play area free of exposed concrete or brick edges?			
Play area free of poor drainage areas?			
Play area free of pests, (bees, ants, rodents)?			
Is climbing equipment & (swings) anchored properly?			
Is there exposed or loose anchoring?			
Is the fall zone adequate and/or in good repair?			
Are there any exposed nails, bolts, screws, pipes?			
Is the wood in good condition?			
Are there any areas of head or body entrapment (spaces >3.5"or <9")?			
Are any pieces, rungs, handles missing?			
Are there any sharp edges?			
Is the storage shed in good repair?			

* Surfaces under play equipment in a 6' radius must have a fall zone of protective surface. Loose materials must be maintained at a depth of 9-12 inches depending on the material and height of the equipment.

**Entrapment areas are fully explained in the CPSC Handbook for Public Playground Safety page 33.

Summary of findings:
If findings were made, by what date should each finding be corrected?

BUILDING MANAGEMENT REPRESENTATIVE:
DATE OF INSPECTION:

Environmental Management

Technical Guide

E501.0493

LEAD IN DRINKING WATER AT CHILD CARE CENTERS

BACKGROUND

The General Services Administration (GSA) started testing in 1990 for lead in drinking water at all GSA child care centers. GSA tests drinking water for lead at child care center since children are sensitive to the effects of lead at low levels.

GSA tests potable water for lead in child care centers at all drinking water outlets, including water coolers. Corrective actions must be taken when lead levels are measured at or above 15 parts per billion (ppb).

DISCUSSION

Health Effects

Medical research shows lead to be harmful to human health even at low exposure levels. Young children, infants, and fetuses are particularly vulnerable to lead. Physical and behavioral effects of lead occur at lower exposure levels in children than in adults. A dose of lead that would have little effect on an adult can have a significant effect on a child. Low levels of lead exposure in children have been linked to damage to the central and peripheral nervous system, learning disabilities, shorter stature, impaired hearing, and impaired formation and function of blood cells.

Many children with lead poisoning have no symptoms; others have only non-specific symptoms such as headaches, stomachaches, or irritability. At its worst lead poisoning can result in kidney damage, stupor, coma, or severe brain damage.

The degree of harm depends upon the total exposure to lead from all sources, such as air, soil, dust, food (which may contain lead absorbed from air or food containers), leadbased paint, and water. Lead in drinking water can be a significant contributor to overall exposure to lead, particularly for infants whose diet consists of liquids made with water, such as baby food formula.

How Lead Gets Into Drinking Water

Lead contaminates drinking water by being present in the source water or through corrosion of lead or brass parts in a distribution/plumbing system. Most sources of drinking water used by public water systems have no lead or very low levels.

It is more common that the source of the lead is from the corrosion of lead pipes, solder, fixtures, or other parts of the plumbing system which distributes the water within the building. The corrosion of lead solder is the major cause of lead contamination.

Corrosion, a reaction between the water and the lead pipes or solder, is commonly caused by soft or acidic water. Soft water is characterized by soap lathering easily and acidic water has a low pH. If the water is not too corrosive, mineral deposits may form a coating on the inside of water pipes. The coating insulates the water from lead solder and lead levels should decrease over time. However, if the water is corrosive, the lead solder can remain a problem, regardless of the plumbing's age.

The extent of lead contamination is affected by several factors including:

- the corrosivity of the water:
- the amount of lead or brass contained in the plumbing, the faucets, or apparatus dispensing the water;
- the contact time of the water with materials containing lead;
- length and diameter of lead service lines;
- the number and age of lead soldered joints;
- whether or not electrical systems are grounded to the water pipes;
- the age of the plumbing; and
- sediment in pipes and fixture screens.

Lead contamination may not occur uniformly throughout a building. Large variations in lead concentrations may be found among individual outlets in a building because of variations in flow rates and different building materials.

If the source of the contamination is at the beginning of the distribution system, high lead levels in the drinking water may be widespread throughout the building. Lead service connectors, which are the pipes that carries water from the public water main to the building, may also be the cause of the problem. High lead levels may also be found in sections of the distribution system where the water is infrequently used or if lead solder is used for repair or installation of plumbing.

Environmental Protection Agency's Regulations

The Safe Drinking Water Act of 1974 requires the U.S. Environmental Protection Agency (EPA) to set drinking water standards to protect public health. In 1986, major

amendments to this law called the Lead Contamination Control Act, requires the use of "lead-free" pipe, solder, flux in the installation or repair of any public water system or any plumbing in a residential or non-residential facility connected to a public water system. Solder and flux are considered "lead-free" when they contain not more than 0.2 percent lead. Pipes and pipe fittings are considered "lead-free" when they contain not more than 8.0 percent lead.

The Lead Contamination Control Act also required EPA to publish a list of drinking water coolers, by brand and model, which are not lead free. The list identifies each brand and model of drinking water cooler which has a lead-lined water tank (reference 2).

On June 7, 1991, EPA issued its regulation for lead in drinking water [40 Code of Federal Regulations (CFR} 141.51 I. The regulation focuses on four main areas to reduce lead concentrations: corrosion control, treatment of source water, public education and replacement of lead service lines. The regulation requires all public waters systems to test their water at the consumer's tap to determine lead concentrations. Based on the results of this testing, the following actions must be taken.

- All public water systems are required to optimize corrosion control to minimize lead contamination resulting from the corrosion of plumbing materials. Public water systems that have concentrations below the EPA action level of 15 ppb for lead in more than 90% of tap samples will be considered to have optimized their corrosion control treatment. Water systems have until July 1997 to optimize their corrosion control treatment.

- If the action level is exceeded in 1096 of tap samples, the public water system must monitor its source water to determine whether treatment to remove lead in source water is needed.

- If the action level is still exceeded after installation of corrosion control and/or source water treatment, the water system must eventually replace all lead service lines contributing in excess of 15 ppb of lead to drinking water.

- Whenever the action level for lead is exceeded, public water system officials must undertake a public education program to inform consumers of ways they can reduce their exposure to potentially high levels of lead in drinking water.

An important part of this regulation is that a single sample result that exceeds the action level does not require the water supplier to take action. Only when 10% of the samples exceed 1 5 ppb is action required.

REQUIREMENTS AND RECOMMENDATIONS

GSA's Action Level end Testing Procedures

GSA will use an action level of 15 ppb of lead in drinking water in child care centers. Water sampling and testing should be conducted in accordance with the EPA guidance manual, Lead in School Drinking Water, A Manual for School Officials to Detect, Reduce, or Eliminate Lead in School Drinking Water (reference 1).

Test all drinking water outlets, including water coolers in child care centers. A sample of 250 milliliters of water must be collected from each outlet sampled. The water sampling program should be done in two steps. The first step is to collect samples before the child care center opens and before any water is used. These samples, called the morning first-draw samples, represent the water that is consumed at the beginning of the day or after infrequent use. If these samples show no lead contamination, the water the children are drinking is probably safe.

The second step involves the collection and analysis of follow-up samples from identified outlets and, if necessary, additional samples from the interior plumbing within the building. The purpose of the follow-up samples is to pinpoint the sources of lead in the drinking water. Once the sources of contamination are known, appropriate remedial actions toward their elimination may he taken.

Also samples should be taken immediately after vacations, weekends or holidays. Do not use these samples to locate the source of lead contamination. These samples may contain higher lead levels than ones collected during the week, but are not representative of water in contact with the plumbing overnight. EPA recommends that child care centers flush drinking water outlets after weekends and vacations until these additional tests are made to determine lead levels for this period.

Analysis of Water Samples

Analysis of samples must be performed by a State-certified laboratory using EPA approved methods. To maintain quality assurance, duplicate (split) samples, blanks (distilled) water, and/or prepared samples of a known value should be taken.

Previous Testing

Water outlets that have been previously tested for lead do not have to be resampled if lead levels were below 15 ppb and testing procedures followed EPA guidance.

Initial Actions

If drinking water testing results are equal to or exceed 15 ppb, the Field Office manager, using technical assistance from the regional Safety and Environmental Management Branch/Division, should develop and carry out a plan for corrective action(s). The following actions are recommended:

1. Immediately identify and isolate contaminated drinking water source(s).

2. Provide a secondary source of drinking water (for example. an alternate drinking water source or bottled water).

3. Contact the supplier of the water and ask what they are doing to reduce lead in the water. The supplier of the water is required to have a lead reduction program if lead levels exceed 15 ppb in 90 percent of tap samples. If the local water system is taking steps to implement a corrosion control program to make the water less acid and/or soft, then lead levels are reduced throughout the system.

4. Take follow-up samples from all drinking water outlets where test results indicate lead levels over 15 ppb. Follow EPA guidance for schools (reference 1).

Interim Measures

Until permanent solutions are carried out, the following interim measures should be considered to reduce lead contamination. These interim measures are necessary until corrosion control or other treatment by the water supplier is effective or until new piping within the buildings develops a protective coating. Periodically monitor lead levels in the drinking water until levels decrease below 15 ppb and before interim measures are discontinued.

1. Clean debris from all accessible screens frequently. Sediments containing lead can be trapped on screens and can be a significant source of lead contamination. Test sediments for the presence of lead.

2. Inform clients to use only cold water for the preparation of food and beverages. Hot water dissolves lead more quickly than cold water and is likely to contain higher levels of lead. If hot water is needed, it should be drawn from the cold-water tap, then heated.

3. Purchase bottle water. Bottled water sold in interstate commerce is regulated by the Food and Drug Administration. Water that is bottled and sold within a state is under state regulation. Obtain a written statement from the bottled water distributor guaranteeing that lead levels in the water do not exceed 5 ppb.

4. Flush the water system before the child care center opens in the morning. Flushing may not be practical in large buildings or when the lead levels return to their original levels within four hours of flushing. Refer to EPA guidance for schools for details on how to flush a water system.

5. Determine if copper pipes installed after 1986 are joined with lead solder This practice was banned in 1986. Lead solder looks dull gray, and when scratched with a key looks shiny. If lead solder was used after 1986, notify the plumber who did the work and request that he or she replace the lead solder with lead-free solder. In addition, notify the state water department who is responsible for enforcing the Safe Drinking Water Act about the violation.

Permanent Solutions

Several actions can be taken to reduce permanently or eliminate the sources of lead in the building's plumbing system. Field Office managers must examine these options and make their own decision based on such factors as cost, availability of water, and manpower requirements.

Permanent solutions include the following:

1. Install commercially available corrosion control devices for individual buildings, such as calcite filters, soda ash or phosphate solution tank and feeder units. When selecting a device consider the performance record and the corrosion-reduction capabilities. Contact the State department of health or environment for assistance and advice about selecting and installing point-of-entry devices. Do not purchase carbon, sand, cartridge filters or water softeners since these devices are not effective in removing lead from water.

2. Point-of-use treatment devices, such as reverse osmosis devices and distillation units, can reduce lead levels at the tap. These devices should only be installed at the tap since they also soften water. Units are expensive and may be either purchased or leased. Problems with a point-of-use device are that effectiveness varies, increased water usage, may be subjected to vandalism and a maintenance contract may be required for regular upkeep. Before purchasing a device, check with the State department of health or environment or the National Sanitation Foundation (NSF). NSF has a testing program to evaluate the performance of point-of-use treatment devices. NSF's address and telephone number are:

   NSF, 3475 Plymouth Road, P. O. Box 1469, Ann Arbor, MI 48106, (313) 769-8010.

3. Remove existing wires grounded to the water pipes by a qualified electrician and install an alternative grounding system. Electrical current accelerates the corrosion of lead in the piping materials. Assure that the state or local building codes allow removal of electrical grounding from

water pipes In some instances, remove' of grounding from water pipes may create a shock hazard unless an acceptable alternative ground is provided.

4. Replace outlets if the sources of lead contamination are localized and limited to a few outlets.

5. Install a time-operated solenoid value and set it to automatically flush the main pipes of the system, known also as headers. Drinking water fountains cannot be flushed automatically, but may be manually flushed by maintenance personnel.

6. Replace the portion of lead service lines under the jurisdiction of the building if the water supplier is replacing its lead service lines. The supplier of the water is required to replace lead service lines if corrosion control and/or source water treatment are not effective. The water supplier will only pay to replace the portion of the service line under its control, but the supplier must offer to replace the building owner's portion of the line at the building owner expense.

7. Modify the plumbing system so water supplied for drinking or cooking bypasses sources of lead contamination.

Notification and Reporting

The regions must forward the results of water testing for lead in child care centers to the building manager or occupant agency liaison. The building manger or occupant agency liaison must inform child care center employees and the parents or guardians of children that attend the child care centers of the results and response actions that will be taken if lead levels exceed 15 ppb.

Central Office, Environmental Management Branch, tracks all child care centers were lead levels have not been reduced below the action level on a quarterly basis. Regions are required to submit their most up-to-date list of child care centers where lead levels have exceeded the action level and summary information at the end of each quarter.

Enter response/abatement actions into the Safety and Environmental Management System (SAFE) and into the Repair and Alterations Computerized Automated Tracking System, if it is out of the funding authority of the Facility Manager.

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LEAD-BASED PAINT IN CHILD CARE CENTERS

BACKGROUND

The General Services Administration (GSA) tests all painted surfaces in proposed or current child care centers for lead. If lead-based paint is detected in a child care center, then the paint must be abated by methods specified in the Department of Housing and Urban Development (HUD) guidelines on testing and abatement of lead-based paint (i.e. replacement, encapsulation, or paint removal).

Locations must have all lead-based painted surfaced abated before the child care center opens, or abated immediately if the facility is already opened. Children will not be allowed in the center until the paint is abated and the clearance criteria has been meet.

DISCUSSION

Sources and Locations of Lead-Based Paint

Lead was a major ingredient in many paints before World War' II. In the early 1950s other pigment materials became more popular, but lead compounds were still used in some pigments and as drying agents in alkyd oil based paint. Latex water based paints generally did not contain lead. The manufacture of residential! lead-based paint was banned by the Consumer Product Safety Council in 1978.

Any building constructed before the 1 980s may contain lead-based paint. Lead-based paint may be on any interior or exterior surface, particularly on woodwork, doors, and windows. Lead is still used in industrial and marine paints as a rust inhibitor, and is used on steel structures such as bridges, ships, and the exterior of water tanks.

Health Effects of Lead Exposure

The health risk from lead-based paint has been recognized since the 1 800's, but the level that lead becomes dangerous is still being debated. Children have been found to suffer irreversible physical and mental changes at levels that once were considered safe. For example, in 1960 a child with a blood lead level of 60 micrograms per deciliter (µg/dl) was considered to be lead poisoned; in 1991 the Centers for Disease Control lowered this level to 10 µg/dl.

Young children, infants, and fetuses are particularly vulnerable to lead. The physical and behavioral effects of lead occur at lower exposure levels in children than in adults. A dose of lead that would have little effect on an adult can have a significant effect on a child.

Young children, than six years, are at higher risk since they often play on the floor where lead dust gathers. Also children tend to place objects in their mouths, such as paint chips or objects that can be contaminated with lead dust. Low levels of lead exposure in children have been linked to damage to the central and peripheral nervous system, reading disabilities, shorter stature, impaired hearing, and impaired formation and function of blood cells.

Many children with lead poisoning have no symptoms; others have only non-specific symptoms such as headaches, stomachaches, or irritability. At its worst, lead poisoning can result in kidney damage, stupor, coma, or severe brain damage. A blood test is used to determine if a child has been poisoned by lead.

The Occupational Safety and Health Administration (OSHA) Regulations

In 1978, OSHA issued a comprehensive standard regulating occupational exposure to inorganic lead in general industry, 29 Code of Federal Regulations (CFR) 1910.1025. Under this standard, the permissible exposure limit (PEL) for inorganic lead is 50 micrograms per cubic meter ($\mu g/m^3$) of air as an 8-hour time-weighted average (TWA). The general industry standard also has provisions for exposure monitoring, engineering and work practice controls, training, medical monitoring, record keeping, and job removal.

The construction industry is not covered under the general industry standard, but OSHA has a lead standard specific to construction. Unlike the OSHA standard for general industry, the construction standard for inorganic lead, 29 CFR 1926.55, does not require medical monitoring of workers exposed to lead or removal of workers from the job when they show elevated concentrations of lead in the blood. The PEL for inorganic lead under the construction standard is 200 $\mu g/m^3$ of air as an 8-hour TWA. The abatement of lead-based paint is regulated under the construction standard.

In 1991, OSHA issued guidance which recommends that all the requirements of the general industry regulation for lead, 29 CFR 1910.1025, be followed when removing of lead-based paint (reference 3).

State Regulations

The States of Maryland and Massachusetts have passed regulations on abating lead-based paint, and legislation is pending in several states. GSA Safety and Environmental Management personnel should check with their state environmental offices to determine if there are any state requirements for abatement or disposal of lead-based paint.

Department of Housing and Urban Development (HUD) Guidance on Lead-Based Paint Abatement

In 1989, Congress directed HUD to develop guidance for testing, abatement, cleanup and disposal of lead-based paint in public and Indian housing. In 1990, HUD issued interim guidelines on testing and abatement of lead-based paint (reference 1). This is currently the most

widely accepted guidance available on lead-based paint abatement techniques. The HUD guideline has stringent requirements and is aimed at preventing lead poisoning in children.

REQUIREMENTS AND RECOMMENDATIONS

Testing and Definition of Lead-Based Paint

HUD defines lead-based paint as any paint containing lead measured at 1.0 milligram per square centimeter (mg/cm^2) by a x-ray fluorescence analyzer (XRF) or 0.5 percent by weight by laboratory testing. Testing for the presence of lead-based paint should be done using either XRF or laboratory analysis of a sample of the paint.

On-site XRF Testing

X-ray fluorescence analyzer (XRF) instruments x-ray paint, which causes lead to emit a characteristic frequency of radiation. The detector measures the frequency and correlates it with the amount of lead in the paint. There are two types of XRF detectors available: direct readers and spectrum analyzers. Direct reading XRF provides the operator with a direct readout of lead concentration in the paint. Spectrum analyzer XRF provide a complete radiation spectrum, which is analyzed by the instrument's software to improve the accuracy of the lead measurement. The spectrum analyzer XRF is more accurate than the direct reader, but it is more expensive and produced by only one manufacturer.

XRF sampling is preferred by HUD since it is relatively inexpensive, provides rapid results and does not require removal of paint from the surface for most samples. For more information on how and where to take measurements, refer to Appendix 4 of the HUD Interim Guidelines.

Laboratory Analysis of Paint

The two types of laboratory methods used for the analysis of paint are atomic absorption spectrometry and inductively coupled plasma-atomic emission spectrometry. The advantages of laboratory testing is that it is more accurate than XRF and can be used to confirm inconclusive XRF measurements. The disadvantages are that laboratory testing is expensive, the processing time for analysis may be slow, and the method requires the removal of paint.

If laboratory results are reported in mg/cm^2, the paint must be removed down to the bare substrate from a measured surface area. Accurate determination of the surface area is important but adherent substrate or other non-paint material will not affect the result.

If laboratory results are reported as weight percent, the paint must be removed down to, but not including, the bare substrate. Inclusion of substrate materials in the paint sample or not removing all paint will dilute the results. For more information on how and where to collect samples, refer to Appendix 5 of the HUD Interim Guidelines (reference 1).

Any laboratory used shall be accredited by the American Industrial Hygiene Association (AIHA) for lead analysis, or demonstrate equivalent technical qualifications.

Interior Abatement Strategies

The three general strategies for lead-based paint abatement are replacement, encapsulation and paint removal. When deciding which method(s) to use, the advantages, disadvantages, and costs of each strategies should be considered. The following methods of lead-based paint removal shall not be used: open flame burning, dry scraping, and machine sanding without attached high efficiency particulate air (HEPA) filtration.

Replacement

Replacement refers to the removal of components that are covered with lead-based paint, such as windows, doors, and trim, and installing new components without lead-based paint. Replacement can be done on many exterior and interior components, but not for most walls, ceilings, and floors. Replacement is a permanent solution and offers these advantages:

- Integrates well with renovation and modernization projects.
- Replacement may increase energy efficiency. For example, replacement windows can be more energy efficient than the original windows.
- Allows for the upgrading of components.
- No lead residue is left behind on surfaces.

The disadvantages of replacement are:

- The cost is high if replacement is done outside the context of a large-scale rehabilitation project.
- Replacement components may be of lower quality than the original components.
- Adjacent surfaces may be damaged. For example, plaster walls can be damaged when baseboards are removed.
- Reinstallation of certain components requires skilled carpentry.
- A large volume of abatement debris may be generated.
- Nonstandard replacement parts may require special orders and additional ordering time.

Encapsulation

Encapsulation refers to making lead-based paint inaccessible by covering or sealing painted surfaces. Encapsulation is a good method for large surfaces such as walls, ceilings and floors. Methods also exist to encapsulate interior and exterior walls, pipes, exterior and some interior trim.

Encapsulants require periodic inspection and may require routine maintenance. Only encapsulants that have been proven to be durable, impregnable to young children, vermin-proof and fire-resistant should be used. A new coat of paint or primer, paper wall coverings, or contact paper should not be used as an encapsulant.

Gypsum dry wall and exterior siding are very durable encapsulants. Sheet rock, vinyl wall covering, and wood paneling can also be used. Tile, wood, stone and vinyl coverings can be used to seal lead paint on floors. If any of these materials are used, the appropriate fire protection characteristics should be considered.

Well prepared surfaces are important to the durability and integrity of the encapsulating system. For example, peeling lead paint on walls should be removed by scraping before encapsulation. Misting of peeling paint before scraping to prepare for encapsulation is an inexpensive and effective method for reducing the amount of lead dust generated. Surfactants (wetting agents) may be added to the water to ease cleanup.

Documentation of encapsulation is important since there is the potential for exposures to underlying lead-based paint during maintenance and renovation activities. Problems may also arise during future lead paint inspection activities because encapsulated lead paint can be detected by XRF testing methods.

Off-site Paint Removal

Off-site chemical removal is the stripping of lead paint from a building component at a professional paint stripper facility. Stripping is done in special chemical tanks. Some considerations are:

The quality of the finished product is usually better than for on-site removal.

- The cost of removal, treatment, and reinstallation.
- Possible damage to components or adjacent surfaces during removal and reinstallation of the components, and to hardware left on components during removal.
- Possible swelling of some components, which may make reinstallation difficult.

- Lead residue may remain on the substrate, which makes components difficult to handle and clean.

On-site Paint Removal

All on-site paint stripping methods/materials are potentially hazardous and should be used with care. On-site removal does not require highly skilled labor, but most on-site removal methods leave lead residue on substrates and may be difficult to remove. A combination of methods is generally used during an abatement job. General methods are:

- Heat Guns - Heat guns may pose a potential fire hazard if not used carefully. Heat guns generate noxious organic vapors which are formed from the thermal decomposition of the paint film. Heat gun use requires good ventilation with open windows and exhaust fans. A respirator equipped with a combination HEPA and organic vapor cartridges should be worn. Heat guns should not be operated at more than 700 ° F. Heat guns work best when the paint is thick and can be used on floors that are to be preserved for aesthetic reason.

- HEPA Sanders - HEPA sanders are equipped with a special vacuum that filters out lead particles. The HEPA sander is recommended only for limited surface areas. The potential for generation of lead dust increases when the sanding disk is wider than the surface being abated because the sanding shroud is not always in contact with the surface. It works best on flat surfaces such as jambs or stair risers. Other types of sanders or filters cannot be used to remove lead-based paint.

- Chemical Strippers - Chemical paint removal methods work best on metal substrates. An exception is that caustics should not be used on aluminum. On-site chemical removal methods may require multiple applications depending on the number of layers of paint.

  Some solvent-based chemical strippers may be flammable and/or contain toxic substances. The Material Safety Data Sheet (MSDS) must be obtained for any stripper used and reviewed. Most chemical strippers require good ventilation with open windows and exhaust fans. Removers that contain methylene chloride should not be used since this chemical is a suspect carcinogen.

  Caustic chemical strippers can cause skin and eye injuries if not used properly. Review the MSDS to determine what personal protective equipment is necessary. Also, the high pH of caustic strippers may require that they be treated as a hazardous waste, regardless of the lead content.

The process of washing and neutralizing substrates on which caustic chemicals have been used can create large quantities of lead-bearing liquid waste. This is caused by the large amount of lead residues left on the surface by this method. Any surfaces that have been stripped with caustic chemicals or that have come into contact with this liquid waste should be cleaned by wet washing until there is no visible residue.

Work Procedures

Good work practices must be carried out to reduce employee exposure to lead. Recommended work practices include providing on-site washing facilities, clean segregated areas for changing clothes, signing work area, daily cleanup procedures, spray misting of dry debris before cleanup, and not allowing dry sweeping and compressed air cleaning.

Containment is necessary to prevent the spread of lead dust to adjacent areas. If the abatement plan necessitates the breaking or disturbing of leaded surfaces, the containment steps described below should be taken. If abatement does not break or disturb lead-painted surfaces, containment measures should be used to protect surfaces, furniture, and personal possessions from damage.

Remove movable objects from the work area. Seal work areas using 6-mil polyethylene sheeting on doorways and entrances. The plastic can be attached to framing if necessary. Effective barriers at openings between work and non-work areas can created by using two layers of 6-mil plastic sheeting.

Cover floors with at least two layers of 6-mil polyethylene sheeting. The air heating/conditioning systems should be shut down and the intake and exhaust points in work area should be sealed.

Use polyethylene sheets 6 mils thick to cover all nonmovable objects that are not being abated, including radiators, large pieces of furniture, shelves, cabinets, built-in furniture, stoves, and floors.

Clean-Up and Disposal

Daily cleanup activity is important throughout the entire abatement process. Early removal of dust from the work area will reduce the potential for recontaminating the property. The final cleanup should start no sooner than 24 hours after active abatement has ceased to assure that all airborne lead dust has settled out.

All surfaces from which lead-based paints have been stripped will be coated with a residue of lead dust that is very difficult to remove. Unless cleanup is thorough and complete, large amounts of nearly invisible lead dust can become embedded in the new paint. This lead can be remobilized rather quickly if it is present on surfaces subject to abrasion, such as windows.

The most effective cleaning involves dry cleaning using a HEPA vacuum and wet cleaning using a high-phosphate detergent. At the conclusion of the abatement process, all surfaces in the abatement area should be HEPA-vacuumed. These surfaces include ceilings, walls, floors, windows, doors, fixtures of any kind, built-in cabinets, and appliances. Also clean surfaces that were not painted with lead-based paint but were exposed to lead dust generated by the abatement process. Vacuum rooms by starting with the ceilings and working down to the floors.

After the first HEPA vacuuming, all surfaces should be washed with a high-phosphate solution. Detergents containing at least 5% trisodium phosphate have been found to be most effective. Workers should wear waterproof gloves since trisodium phosphate is irritating to the skin. Clean the same surfaces that were cleaned with the HEPA vacuum. Test all dirty water to determine if it is classified as a hazardous waste (refer to Chapter 11 of the HUD guidelines).

Disposal of lead-containing paint chips, debris and waste water must comply with the Environmental Protection Agency, State and local regulations. Chapter 11, "Waste Disposal," of the HUD Guidelines, (reference 1), discusses the definition of hazardous waste and the requirements involved in testing and disposal.

Clearance Testing

Clearance testing is done with wipe sampling. Wipes consists of commercial wipes moistened with a non-alcohol wetting agent. Detailed guidance on surface wipe sampling is provided in Section A-5.4 of the HUD guidelines.

Lead levels must meet the following clearance criteria:

Floors:	200 micrograms per square foot
Window Sills:	500 micrograms per square foot
Window Wells:	800 micrograms per square foot

The cleaning cycle of HEPA vacuuming and washing may have to be repeated several times to meet the clearance criteria.

Personal Protective Equipment

Protective coveralls and shoe covers should be worn at all times. Disposable coveralls and separate shoe covers are preferred to avoid the need for laundering. Disposable items can be either breathable or non-breathable. Non-breathable coveralls should not be used when the possibility of heat stress exists. Paper suits and shoe covers should not be used for wet abatement processes.

Use special precautions with chemical strippers. Workers should wear face shields, appropriate clothing and gloves. The MSDS should be reviewed for recommendations on the type of clothing and gloves. An eye wash station is recommended when workers use chemical strippers.

Refer to 29 CFR 1910.151 (c) and GSA Emergency Eyewash and Shower Equipment Standard Operating Procedure (SOP) for more information.

Personal air monitoring may be required to determine the level of respiratory protection required. For most lead-based paint abatement, an air-purifying respirator with HEPA filters can be used. This type of respirator can be used in environments where the concentration of lead in air is not in excess of 0.5 mg/m^3. If lead concentrations exceed this level, refer to 29 CFR 1910.1025 for guidance. Follow GSA and OSHA criteria for respiratory protection. This criteria includes fit-testing, training, medical surveillance, cleaning and storing requirements. Requirements can be found in the following publications:

- GSA Handbook ADM P 5940.1
- 29 CFR 1910.134
- GSA Selection, Care and Use of Respiratory Protection for Maintenance Work SOP

Personal Hygiene Practices

Personal hygiene is an important element of protecting workers from lead dust. Provide adequate washing facilities at the worksite so workers can remove lead particles that accumulate on the skin or hair.

All workers exposed to lead should wash their hands and faces before eating, drinking, applying cosmetics, or using tobacco products (cigarettes, cigars, chewing tobacco, etc.). Workers must not be allowed to est. drink or use tobacco products in the work area.

Workers should change into work clothes and shoes at the worksite. Store street clothes separately from work clothes in a clean area. Separate lockers or storage facilities should be used so clean clothing is not contaminated by work clothing and work shoes.

Contaminated clothing must be placed in closed containers when it is cleaned, laundered or disposed of. Persons responsible for handling contaminated clothing should be informed of the potential hazards. At no time should lead be removed from protective clothing or equipment by any means that puts lead into the work area, such as brushing, shaking, blowing, or using a regular vacuum cleaner.

Workers must change back into their street clothes after washing or showering and before leaving the worksite. These procedures are necessary to prevent the accumulation of lead dust in the workers' cars and homes and to protect family members from exposure to lead.

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Training
Train all GSA workers involved in lead-based paint removal on the hazards involved in the operation. Training will be performed by GSA industrial hygienists or contractors. Include the following information:

- The purpose, proper selection, fitting, use, and limitation of respirators.
- The hazards to the fetus and additional precautions for employees who are pregnant.
- Engineering controls and work practices associated with the employee's job assignment.
- The hazards of exposure to lead and symptoms of lead poisoning.
- Personal hygiene practices and the importance of following these practices.
- Unique hazards of abatement techniques, for example fumes from heat guns and skin irritation from chemical strippers.
- The signs and symptoms of heat stress if work is performed in a hot environment.

Develop a hazard communication program to comply with OSHA's Hazard Communication Standard, 29 CFR 1926.59, and GSA Written Hazard Communication Program SOP. This standard states that workers have the right to know what hazards they will be exposed to, what precautions to take and what sources of information are available to them. MSDSs for all chemicals used must be available for workers on request.

Contractors performing renovation projects that require removal of lead-based paint are responsible for training their employees.

Medical Surveillance
GSA workers involved in lead-based paint abatement will be enrolled in a medical surveillance program if they are exposed to lead levels above 30 $\mu g/m^3$ for more than 30 days per year. Medical surveillance consists of biological monitoring of worker blood lead levels and medical examinations. One purpose of biological monitoring is to establish baseline blood lead levels in workers and to detect early increases in worker blood lead levels. A licensed physician must perform or supervised all medical examinations, including collection of blood samples.

GSA employees must be notified in writing of their blood lead levels. If the employee's blood lead levels exceed the numerical criterion for medical removal, the employee should be

qualified for temporary medical removal with protection. Medical surveillance should be provided to employees at no cost and at a reasonable time and place. Any medical surveillance program for lead-based paint abatement should follow the requirements of 29 CFR 1910.1025 and GSA Handbook ADM P 5940.1.

Because many medical authorities believe the OSHA blood lead trigger level for removal of 40 micrograms per deciliter (µg/dl) is too high, the HUD guidelines recommends using more conservative blood lead trigger level. GSA will use the HUD blood lead trigger levels for GSA employees who perform operations involving lead. These levels are:

- Remove worker whenever three blood samples average more than 25 µg/dl; or
- Remove worker whenever a single test exceeds 30 µg/dl.

Contractors performing renovation projects that require removal of lead-based paint are responsible for providing medical surveillance for their employees.

Notification and Reporting

The regions must forward the results of the lead measurements taken in child care centers to the building manager or occupant agency liaison. The building manger or occupant agency liaison must inform child care center employees and the parents of children that attend the child care centers of the results and response actions that will be taken if lead-based paint is detected.

Central Office, Environmental Management Branch, tracks all incomplete abatement projects on a quarterly basis. Regions are required to submit their most up-to-date list of child care centers where lead-based paint has been detected and summary information at the end of each quarter.

Enter response/abatement actions into the Safety and Environmental Management System (SAFE) and into the Repair and Alterations Computerized Automated Tracking System, if it is out of the funding authority of the Facility Manager.

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U. S. Department of Labor. Occupational Safety and Health Administration. Safety and Health Regulations for General Industry. 29 CFR 1910.1025.

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Emergency Evacuation Planning Guide

for Child Care Centers
in GSA-Owned
or -Leased Space

An Update to the Occupant Emergency Program Guide

Federal Protective Service
Public Buildings Service
U.S. General Services Administration

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Child Care Centers in GSA-Owned or Leased Space

This is a guide for developing evacuation procedures at child care centers in GSA-owned or -leased space. These procedures will be incorporated into the Occupant Emergency Plan (OEP) for each facility. A copy of the OEP far the facility should be maintained at each child care center.

Evacuation drills shall be conducted at least once a month at varied tunes of the day and during various activities.

The designated official and a physical security specialist should work with the director of the child care center to develop and post emergency response procedures

In the development of the initial OEP for a facility, employees within the facility will be asked to volunteer to assist with the evacuation of children from the child care center and to perform specific tasks outlined in this guide. Such employees should be able to respond quickly to assist the child care center workers to evacuate the children.

A list of the volunteers (and alternates) and their locations and telephone numbers within the facility will be attached to the OEP for the facility.

Upon receiving notification of evacuation, all children must be evacuated from the child care center.

A primary area and an alternate area will be identified as the locations where children will assemble after an evacuation. A roll call will be taken by name after exiting the facility and again upon returning to the center.

Child care staff and volunteers must understand that evacuation is made before considering the comfort of the children in inclement weather. The safety of the children should be the first concern.

Train children who are capable of walking to exit the building in an orderly manner during emergencies and drills Techniques may include using a buddy" system and line drills.

Plans must be made for evacuating nonwalking children in evacuation devices, such as evacuation cribs with high, sturdy sides (capable of being locked or otherwise secured) with sturdy wheels. The devices will be rolled out of the child care center to the assembly point. Cribs must be designed for evacuation purposes.

If evacuation cribs are not available, alternative devices, such as shopping carts I or strollers or wagons, will be u se d

The child care center on-site director/designee will be responsible for ensuring that all children have been evacuated. This employee will physically check all areas within the center. Once this check is completed, the employee will notify the local Federal Protective Service control center that all the children are out of the building. The phone number of the control center will be identified in the OEP for the building.

Upon evacuation from the facility, no one will be allowed to reenter the facility until an all clear signal is given.

Child care center workers will be familiar with and follow all the instructions in the OEP concerning bomb threats, bombs, explosions, fires, medical emergencies, demonstrations and disturbances, power failures, spills/leaks of hazardous substances, and natural disasters (hurricanes, tornadoes floods, earthquakes, etc.).

If the OEP designated official determines it necessary, a special designation (a colored vest or arm band) shall be worn by child care center staff during an evacuation

The On-Site Director

The responsibilities of the on-site director are to:

- recruit volunteers for center evacuation.

- serve as team coordinator during drills and emergencies.

- ensure that an alternate is appointed to serve as the coordinator in the absence of the on-site director.

- know the volunteers assigned to assist the children in the center.

- provide a list of responsibilities and instructions to the volunteers regarding their duties during drills and emergencies.

- provide on-site evacuation training.

- perform evacuation drills monthly.

- prepare a daily roster of all children present in the child care center.

- during an evacuation, check volunteer reports on evacuated children against the daily roster to ensure that all children have been evacuated and then returned to the center.

- notify the control center when all the children have been evacuated.

- ensure all child care center employees are familiar with the OEP and know their specific assigned duties during drills and actual emergencies.

- maintain an up-to-date list of parents of all the children for notification purposes.

Volunteers

The responsibilities of volunteers are to:

- know the names of and be able to recognize the children which the volunteer is responsible for during an evacuation.

- evacuate the children assigned to the volunteer end report the evacuation to the on-site director.

- mum the children to the child care center after the emergency and report the return to the on-site director.

- keep an updated list of children for whom the volunteer is responsible.

- respond quickly to an emergency

- become familiar with the children in the center.

- attend evacuation training sessions.

Parents

Parents will not be allowed to remove a child from the center's custody until the emergency is over and all children are accounted for.

Parents will be instructed not to call the child care center during emergencies when an evacuation is in progress (including practice drills).

Parents will be informed, when children are accepted into the child care center, of the designated assembly point where the children will be taken during emergencies.

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Child Care Center Contact:	Telephone Number
Building Manager:	
Occupant Emergency Coordinator (On-site Director):	
Occupant Emergency Coordinator Alternate:	
Number of children in center:	
VOLUNTEERS Name:	
Health Unit:	
Hospital:	
Doctors:	
Nurses:	
First Aid/CPR:	

security

The federal protective service has a security risk assessment for each center on file.
FPS will determine how many and what types of security measures are necessary. Every center will have a secured entrance. The front door should be locked at all times. All parents and staff should have immediate access through the use of key cards, door access codes, or "line of sight" identification by center personnel before allowing entry. Since most centers are too small to employ a full time receptionist the front door security must include a doorbell, a remote strike, and most likely a camera to allow for a teacher located far from the front door to still control access without leaving her classroom.

All centers should be evaluated and comply with the DOJ Vulnerability Assessment Report and the ISC Security Criteria specifications pertaining to window protection in child care centers located in GSA controlled facilities (refer to the GSA, June 14, 1999, memo included at the end of this chapter).

All staff in federal space, by law, must have a criminal history background check. This check includes a finger print check through the FBI and finger print check through the appropriate states the person has lived in for the last 10 years. The FPS regional office also conducts a name check clearance based on the person's name and SSN. Employee clearances are sent back to the director for placement in each employee's file. Staff may start work prior to a final clearance.

The child care center controls the sign-in and sign-out procedure as well as the emergency procedures. If applicable make sure the center knows the control center number for emergencies instead of 911.

All criminal incidents and medical emergencies requiring immediate professional medical attention are to be reported to the FPS as soon as possible. A GSA accident/incident report is filled out. This is in addition to the center's forms and filing procedures required by child care licensing. In the case of suspected child abuse or neglect the child care center is obligated

to report to either the county or state. FPS is not the reporting or investigating authority on these kinds of allegations.

U.S. GENERAL SERVICES ADMINISTRATION
Public Buildings Service

December 4, 1998

MEMORANDUM FOR ASSISTANT REGIONAL ADMINISTRATORS
PUBLIC BUILDINGS SERVICE

DIRECTORS, FEDERAL PROTECTIVE SERVICE
PUBLIC BUILDINGS SERVICE

NATIONAL DIRECTOR, CHILD CARE OPERATIONS
CENTER OF EXPERTISE - 2PNK

FROM: PAUL CHISTOLINI
DEPUTY COMMISSIONER

SUBJECT: Background Checks for Child Development Center Workers in GSA Controlled Facilities

The policy of the General Services Administration (GSA) is that all employees of child development centers located in GSA controlled facilities receive complete and timely background checks. Taking the appropriate steps to ensure proper background checks of child care workers enhances the quality and reliability of this key amenity we provide to our federal customers. The responsibility to ensure that these steps are taken is shared among the Federal Protective Service, the Child Care Operations Center of Expertise, and the Regions. The purpose of this memorandum is to identify and assign specific responsibilities and accountability for the actions that are necessary to ensure to the maximum extent feasible that all child care workers in GSA controlled facilities are properly cleared.

Background

A complete and timely background check consists of basic screening and criminal history background checks. Basic screening includes, at a minimum, personal interviews, reference checks with past employers, past employment verification, personal reference checks, and confirmation of educational status.

GSA conducts criminal history background checks in accordance with the Crime Control Act of 1990, as amended, 42 U.S.C. §13041. The Crime Control Act requires criminal history background checks which are based on fingerprints obtained by a law enforcement officer and conducted through the Identification Division of the Federal Bureau of Investigation and through the state criminal history repositories of all States that a prospective employee lists as current and former residences (in the last ten years) in an employment application. Under the Crime Control Act, an uncleared worker may nevertheless be provisionally employed if "at all times prior to receipt of the background check during which children are in the care of the person, the person is within the sight and under the supervision" of a properly cleared worker. A copy of the relevant statutory provisions is enclosed at Attachment 1.

In July 1996, the Department of Justice authorized GSA's Federal Protective Service to use the Interstate Identification Index (III) and the National Crime Information Center (NCIC) to conduct "name checks" on prospective contract and/or child care workers. The "name check" provides a way to get a quick preliminary screening of prospective employees but does not supplant the requirement to complete the thorough criminal background check in accordance with the Crime Control Act. A copy of this authorization is enclosed at Attachment 2.

PBS issued PBS-IL-97-2 on April 3, 1997 to establish procedures for background checks. This Instructional Letter remains in full force and effect, except to the extent modified by this memorandum. A copy is enclosed at Attachment 3. On March 10, 1998, the President issued a Memorandum directing that proper background checks be conducted on child care workers in federally sponsored child care centers. A copy of the Presidential Memorandum is enclosed as Attachment 4.

Policy

No prospective employee of a child development center in GSA controlled facilities will be allowed to work in the center unless a "name check" has been satisfactorily completed and a complete background check package, as defined in this Policy Memorandum, has been received by the regional FPS office. The background check package includes: a properly completed GSA Form 176, the FD 258 Fingerprint Card(s), a signed certification by the provider indicating that it has satisfactorily completed basic screening of the prospective employee, the "name check" information sheet, and all required State repository forms. A GSA Form 176 will be properly completed if the appropriate blocks have been completed, as shown on Attachment 5.

Any background check that has not been completed and the results provided to the child care provider within sixty (60) days of submission to the regional FPS

office shall be considered delayed and appropriate action shall be taken by the region and FPS to follow up.

Clearances in accordance with this Policy Memorandum are valid for five (5) years.

To ensure that an adequate number of personnel are cleared for new centers, center Directors will be cleared in advance of the opening of a new center. All new centers (along with those undergoing major renovations) must incorporate elements of the design criteria that allow for complete line of sight and visibility throughout the child development center to the maximum extent possible. This will give the Director the ability to see and supervise all personnel. In addition, an adequate number of employees should have clearances in advance of opening and if there is a need to request "emergency/expedited" clearances the Federal Protective Service shall ensure that such clearances are obtained.

Responsibilities

The Child Care Operations Center of Expertise is responsible for oversight of the overall background check process for child care workers. This means that the Center will do the following: develop a nationwide summary of information including number of employees working in child care centers in GSA controlled facilities, the number cleared, the timeliness of the clearances, identification of problem areas and recommendations for remediation actions. In addition, the Center shall ensure that every agreement or contract which permits a child care provider to occupy space in a GSA controlled facility includes a provision which requires the provider to conduct basic screening on all prospective employees and to certify compliance. The Center will also issue, as appropriate, procedures implementing this Policy Memorandum.

Each region is responsible for monitoring the background check process for all child care centers in GSA controlled facilities within its region. This means that each region is responsible for: ensuring that child care providers are aware of, are trained in, and conduct the basic screening on all prospective employees and that the certifications are completed; keeping accurate records of all prospective child care workers within the region that are awaiting completion of background checks; ensuring that appropriate coordination occurs between the regional child care coordinators and regional Federal Protective Service staff; following up on any clearance that is not obtained within sixty (60) days of submission; and providing such information to the Child Care Operations Center of Expertise as is necessary for the Center to evaluate the effectiveness of this policy on a national basis.

The Federal Protective Service is responsible for processing, in a timely manner, the fingerprints and paperwork necessary for the criminal history background check under the Crime Control Act. In addition, Regional FPS is responsible for processing the paperwork necessary for the "name check." The regional FPS offices are responsible for the timely and accurate taking of fingerprints. An FPS employee who qualifies as a law enforcement officer may take fingerprints. If the regional FPS office is not able to accommodate the workload associated with this task, the regional FPS office shall be responsible for establishing alternate arrangements with other federal, state or local law enforcement personnel. Regional FPS offices shall be the processing point for all clearance packages relating to child development center workers in the region. All clearance packages shall be reviewed and forwarded to FPS national office within 3 working days of receipt by the regional FPS office.

FPS is responsible for serving as the single point of contact with the FBI and other law enforcement agencies that are involved in the background check process. Within 3 working days of receipt of a completed background check package, FPS shall forward the clearance request to the appropriate law enforcement entity. FPS will be responsible for follow up with the FBI and other law enforcement agencies with respect to delayed clearances and will coordinate with the regions on the status of such clearances.

Further information

Questions concerning this Policy Memorandum should be directed to Eileen Stern, Director, Child Care Operations Center of Expertise on 212-264-8321.

Attachments (5)

1. The Crime Control Act of 1990, as amended.

2. DOJ authorization of "name check" for child care worker purposes.

3. PBS-IL-97-2.

4. Presidential Memorandum dated March 10, 1998.

5 GSA Form 176.

Public Law 101-647
Crime Control Act of 1990

SUBTITLE E - Child Care Worker Employee Background Checks

SEC 231 REQUIREMENTS FOR BACKGROUND CHECKS

(a) IN GENERAL - (1) Each agency of the Federal Government, and every facility operated by the Federal Government (or operated under contract with the Federal Government), that hires (or contracts for hire) individuals involved with the provision to children under the age of 18 of child care services shall assure that all existing and newly-hired employees undergo a criminal history background check. All existing staff shall receive such checks not later than 6 months after the date of enactment of this chapter, and no additional staff shall be hired without a check having been completed.

(2) For the purposes of this section, the term "child care services"' means child protective services (including the investigation of child abuse and neglect reports), social services, health and mental health care, child(day) care, education (whether or not directly involved in teaching), foster care residential care, recreational or rehabilitative programs, and detention, correctional, or treatment services.

(b) CRIMINAL HISTORY CHECK -- (1) A background check required by subsection (a) shall be _

(A) based on a set of the employee's fingerprints obtained by a law enforcement officer and on other identifying information

(B) conducted through the Identification Division of the Federal Bureau of Investigation and through the State criminal history repositories of all States that an employee or prospective employee lists as current and former residences in an employment application; and

(C) initiated through the personnel programs of the applicable Federal agencies.

(2) The results of the background check shall be communicated to the employing agency.

(c) APPLICABLE CRIMINAL HISTORIES -- conviction for a sex crime, an offense involving a child victim, or a drug felony, may be ground for denying employment or for d_ of an employee in any of the positions listed in subsection (a)(2). In the case of an incident in which an individual has been charged with one of those offenses when the charge has not yet been disposed of, an employer may suspend an employee from having any contact with children while on the job until the case is resolved. Conviction of a crime other than a sex crime may be considered if it bears on an individual's fitness to have responsibility far the safety and well-being of children.

(d) EMPLOYMENT APPLICATIONS -- (1) Employment applications for individuals who are seeking work for an agency of the Federal Government or for a facility or program operated by (or through contract with) the Federal Government, in any of the positions listed in subsection (a)(1), shall contain a question asking whether the individual has ever been arrested for or charged with a crime involving a child, and if so requiring a description of the disposition of the arrest or charge An application shall state that it is being signed under penalty of perjury, with the applicable Federal punishment for perjury stated on the application.

(2) A Federal agency seeking a criminal history record check shall first obtain the signature of the employee or prospective employee indicating that the employee or prospective employee has been notified of the employer's obligation to require a record check as a condition of employment and the employee's right to obtain a copy of the criminal history report made available to the employing Federal agency and the right to challenge the accuracy and completeness of any information contained in the report

(e) ENCOURAGEMENT OF VOLUNTARY CRIMINAL HISTORY CHECKS FOR OTHERS WHO MAY HAVE CONTACT WITH CHILDREN. MAY HAVE CONTACT WITH CHILDREN - Federal agencies and facilities are encouraged to submit identifying information for criminal history checks on volunteers working in any of the positions listed in subsection (a) ant on adult household members in places where child care or foster care services are being provided in a home.

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H.R. 2100 by ASPIN (D-WI)—National Defense Authorization Act for Fiscal Years 1992 and 1993; Missile Defense Act of 1991; Warrent Officer Management Act; Military Construction Authorization Act for Fiscal Year 1992; Panama Canal Commission Authorization Act for Fiscal Year 1992 (Pub. L 102-190, approved 12/5/91)

SEC 1094. PROVISIONAL SUPERVISED EMPLOYMENT OF FEDERAL CHILD CARE SERVICES PERSONNEL.

(a) Employment Pending Completion of Background Check.--Section 231 of the Crime Control Act of 1990 (42 U.S.C. 13041) is amended--

(1) in the second sentence of subsection (a)(1), by striking out "6 months after the date of enactment of this chapter, and no additional staff" and inserting in lieu thereof "May 29, 1991. Except as provided in subsection (b)(3), no additional staff"; and

(2) in subsection (b), by adding at the end the following new paragraph:

"(3) An agency or facility described in subsection (a)(1) may hire a staff person provisionally prior to the completion of a background check if, at all times prior to receipt of the background check during which children are in the care of the person, the person is within the sight and under the supervision of a staff person with respect to whom a background check has been completed.".

(b) Additional Safety Measures for Federal Child Care Service Facilities.-- It is the sense of Congress that each agency of the Federal Government each facility operated by the Federal Government aid each facility operated under contract with the Federal Government, that provides child care services to children under the age of 18--

(1) modify child care facilities to the extent necessary to; ensure that,. except for restrooms, there are no secluded areas not open to the general view of persons in such facilities;

(2) provide for regular oversight of the management and operations of child care facilities by an agency official who is not directly in charge of the operation of the facility; and

(3) to the maximum extent feasible allow parental access to children in child care facilities at all times.

Attachment 2

U.S. Department of Justice

Washington, DC 20530

Rec'd - Jul 3, 1996

Mr. Randolph Lash
Acting Assistant Commissioner
Office of the Federal Protective Service
General Services Administration
18th and F Street, NW, Room 7332
Washington, DC 20405

Dear Mr. Lash:

This is in response to the letter dated January 29,1996, received from former Assistant Commissioner Mr. Garret J. Day, concerning the Federal Protective Service (FPS) request to access the National Crime Information Center (NCIC) via the Justice Telecommunications System (JUST).

The FPS requested access to NCIC/JUST for the purpose of conducting appropriate criminal history and wanted person checks on contract employees working in General Services Administration (GSA) controlled buildings.

Prior policy established by the Criminal Justice Information Services (CJIS) Advisory Policy Board (APB) determined that background checks to protect the physical premises of government buildings was not considered an administration of criminal justice function and, therefore, use of the Interstate Identification Index (III) for that purpose was prohibited.

However, based upon your request, the CJIS/APB revisited this issue at its recent meeting in June, 1996. After a lengthy discussion, the CJIS/APB has revised the policy concerning this matter. The CJIS/APB determined that the protection and security of federal office buildings and courthouse does indeed fall within the administration of criminal justice.

Pursuant to the revised policy, the GSA/FPS is granted authority to utilize the III and NCIC wanted person file for employment purposes to conduct name checks on contract employees working in GSA controlled buildings. It should be noted, however, that following all III checks, fingerprint cards must be submitted as current policy requires.

If you have any questions concerning this matter, please do not hesitate to contact me. I can be reached on (202) 514-5529.

Sincerely,

(sig)

Earl S. Neal, Assistant Director
Enforcement Support and Planning Services
Telecommunications Services Staff
Information Resources Management
Justice Management Division

General Services Administration
Public Buildings Service
Washington, DC 20405

APR - 3 1997

INSTRUCTIONAL LETTER PBS-IL-97-2

MEMORANDUM FOR REGIONAL ADMINISTRATORS
1A, 2A, 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A, WA

ASSISTANT REGIONAL ADMINISTRATORS
1P, 2P, 3P, 4P, 5P, 6P, 7P, 8P, 9P, 10P, WP

REGIONAL CHILD CARE COORDINATORS
1PE2, 2PB, 3PB, 4PMF, 5PMF, 6PMF, 7PM, 8PD, 9PT, 10PMS, WPMF, WCA, WPM, WPT

DIRECTORS,
FEDERAL PROTECTIVE SERVICE DIVISION
1PS, 2PS, 3PS, 4PS, 5PS, 6PS, 7PS, 8PS, 9PS, 10PS, WPS

FROM: ROBERT A. PECK
COMMISSIONER - P

SUBJECT: Background Check Requirements and Criteria for Child Care Center Employees and Staff in GSA-Sponsored Child Care Centers

1. Purpose. This letter revises and updates existing guidelines regarding background checks for child care provider employees working in GSA day care centers. It enhances oversight requirements, provides for a more comprehensive background check, and clearly delineates responsibilities of individuals and organizations involved in the process.

2. Background.

a. Enactment of the "Trible Amendment" in the mid-1980's allowed GSA and other federal agencies to establish day care centers in government-controlled space. With establishment of these centers, the FPS implemented requirements for conducting limited criminal history background checks on child care center employees.

b. 42 USC 13041, Section 231 of the Crime Control Act of 1990, Pub. L. 101-647, established requirements for protecting children in federally sponsored child care centers by requiring that all employees of such centers be subject to limited criminal history background checks through the Identification Division of the FBI and State criminal history repositories. These enhanced requirements were incorporated in GSA's limited criminal history background process.

c. As a result of the bombing of the Murrah Building in Oklahoma City, the President directed the Department of Justice (DOJ) to establish an interagency working group to assess the vulnerability of existing federal office buildings in the United States to acts of terrorism

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and other forms of violence. Their report, the June 28, *1995 Vulnerability Assessment of Federal Facilities*, recommended that GSA should modify its policy allowing service and construction contract personnel and child care center employees to work in federally controlled space prior to obtaining appropriate background investigations. As a result, the Federal Protective Service (FPS) was, granted an exception by DOJ to their policy restricting the use of the National Crime Information Center (NCIC) computerized information system for employment purposes.

d. Last year, the GSA Office of Inspector General (OIG) completed an audit of procedures dealing with the conducting of limited criminal history background checks for child care employees in GSA-controlled space and recommended that the process be improved in a number of areas.

3. General. To address the recommendations contained in the DOJ vulnerability assessment and resolve the findings in the OIG audit, the Office of Workplace Initiatives and the Office of Federal Protective Service have developed an improved process for conducting background checks for child care center employees

4. Policy. All child care employees will be required to successfully undergo a limited background suitability check before being allowed to work without direct supervision in a GSA-licensed day care center. This includes all full time employees, part-time employees, consultants, substitutes, cooks, and regular volunteers. Additionally all child care center employees shall undergo a pre-employment check of certain automated criminal history records maintained by the FBI prior to beginning employment in the center. Note: Successful completion of the pre-employment check does not preclude requirements that child care center employees work under direct supervision of employee(s) who have already been cleared.

a. GSA has executed a Memorandum of Understanding (MOU) with the Office of Personnel Management (OPM) Investigations Service to provide a background check for day care employees based on the National Agency Check with Inquiries (NACI). This new process, which will be conducted by the newly privatized US Investigative Service located in Boyers, Pennsylvania, will provide a more comprehensive review of an individuals background than the current limited criminal history background check. Additionally, OPM will provide enhanced investigation packages within certain defined time frames allowing for more timely completion.

b. Adjudication of background investigations will be transferred from the Office of Federal Protective Service to FPS regional offices to allow for better accountability and reduced processing. Initial training for regional personnel who will assume the adjudication duties and responsibilities will be conducted at the Department of Energy Central Training Academy in Albuquerque, New Mexico, beginning in April 1997.

c. An automated tracking system is currently under development which will provide for direct access and update tracking and status information by FPS and child care coordinators for child care center employee and staff background checks. FPS personnel will also receive direct telephone access to request the latest status of OPM investigation proceedings.

d. The following roles and responsibilities are established to ensure clear understanding all participants in this critical process.

1) The child care coordinator in each region will have primary responsibility for ensuring that all employees working in GSA-licensed day care centers are in compliance with the provisions of 42 USC 13041:

a) Ensuring that all GSA-sponsored day care centers have properly executed license agreements thereby ensuring that requirements for background checks will be conducted;

b) Conducting periodic reviews of child care center staffing (including employees, volunteers, etc.);

c) Tracking status and progress of background investigations to ensure timely completion;

d) Routinely informing senior management and others of significant problems or delays; and,

e) Coordinating with FPS personnel to enforce licensing provisions when required information from employees or day care center directors is not provided in a timely manner.

2) Day care center directors will be responsible for ensuring that all employees and other staff working in the center meet these policy requirements.

a) Comply with the requirements of 42 USC 13041 regarding direct supervision of employees who have not successfully completed their background checks;

b) Ensure that required forms and fingerprint card(s) are prepared in an accurate and timely manner, and reviewed and submitted at least three (3) working days prior to the anticipated beginning of employment in the child cart center.

c) Provide updated, corrected or additional information to FPS adjudication personnel or regional child care coordinators as requested;

d) Maintain appropriate records to support government review of the status of background checks for employees and other staff; and,

e) Take immediate action to separate or remove employees found unsuitable as a result of a background check.

3) FPS personnel will ensure that background suitability checks for child care center employees and staff are conducted in an expeditious manner:

a) Review forms and fingerprint card(s) submitted by child care center directors to assure they are complete and accurate. If additional information is needed, obtain from center directors;

b) Regional FPS officials will provide assistance to day care center directors in obtaining required fingerprints for FBI review and state repositories by identifying locations where employees can be fingerprinted. In some cases, FPS may do the fingerprinting;

c) When forms have been reviewed and all required information has been obtained, conduct required NCIC Interstate Identification Index (III) and wanted person files name checks within three (3) working days;

d) Enter information in tracking system(s) in a timely manner to assure that the suitability background review can be completed as quickly and thoroughly as possible;

e) Provide regional child care coordinators with status and progress reports to assist in oversight and compliance efforts of the requirements contained in 42 USC 13041; and,

f) Supply day care centers with applicable forms and fingerprint card(s).

5. Effective date: April 1, 1997

6. Expiration date: Until superseded or canceled.

7. Cancellation: All previous requirements and procedures, except those superseded by the above guidelines, are still in effect. Final suitability adjudication for child care center employees will continue to be based on the criteria as outlined in the Contract Employee Adjudication Guidelines in PBS-IL-97-1.

8. Reference to directives: This instructional letter contains policies affecting the Federal Protective Service Policy Handbook, PBS P 5930.17B.

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For Immediate Release March 10, 1998

March 10, 1998

MEMORANDUM FOR THE HEADS OF FEDERAL DEPARTMENTS AND AGENCIES

SUBJECT: Steps to Improve Federally Sponsored Child Care

Now more than ever, America's working parents are struggling to balance their obligations to be good workers -- and their more important obligations to be good parents. By choice or by financial necessity, millions of Americans rely on child care to care for their children for of each day. Parents deserve to know that their children are safe a-d nurtured in child care.

One of my highest priorities is to make child care better, safer, and more affordable. That is why my balanced budget includes the most significant investment in child care in our Nation's history and proposes specific measures to improve child care quality.

As a supplier of child care and as an employer that must recruit and retain a strong workforce,, the Federal Government should lead the way in improving child care. I am proud that our military has developed one of the fines. child care delivery systems in the world, and that the Department of Defense, at my request, is sharing its expertise with the public and private sectors. Still, we need to do more. The executive branch of the Federal Government has responsibility for over 1,000 child care centers -788 through the military, 109 through the General Services Administration, and 127 through other Federal departments. In addition, the military oversees nearly 10,000 professional family child care providers. In total, approximately 215,000 children are in our care.

Today I am directing my Administration to take significant new steps to improve the quality of Federally sponsored child care in the executive branch by (1) ensuring proper background checks of child care workers; (2) achieving 100 percent independent accreditation of all eligible centers; (3) exploring partner-ships among Federal agencies and with the private sector to improve child care quality and affordability; and (4) ensuring that all Federal workers become better informed of child care benefits and the options available to them.

First, all child care workers in Federally sponsored centers should undergo thorough background checks to make sure that our children are safe. The vast majority of child care workers are caring people who have dedicated their lives to teaching and nurturing children. But one tragedy in child care is too many, and criminal and civil background checks are necessary to determine whether the people caring for our children are fit

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for this responsibility. The military already has a model system to conduct background checks of child care workers. I now want to guarantee that workers at all nonmilitary, Federal child care facilities undergo such background checks in a thorough and timely fashion.

I therefore direct the Administrator of General Services ("Administrator") to report to me, within 90 days, with a plan to ensure complete and timely background checks, to the fullest extent possible, for all child care workers in nonmilitary, Federally sponsored child care settings. Agencies with oversight of nonmilitary child care settings will report to the Administrator within 60 days on this matter.

Second, all Federally sponsored child care centers should receive nationally recognized, independent accreditation as soon as they are eligible to do so. Currently, only 76 percent of military centers, and 35 percent of other Federally sponsored centers, are accredited. By the year 2000, 100 percent should be accredited. I therefore direct the Secretary of Defense and the Administrator to provide me, within 90 days, with a plan to ensure, to the fullest extent possible, independent, nationally recognized accreditation of all eligible, Federally sponsored child care by the year 2000. Agencies with oversight of non-military child care settings shall report to the Administrator within 60 days on this matter.

Third, partnerships among Federal agencies and with the private sector are an increasingly important way to maximize existing resources and improve child care. I therefore direct the Administrator to work with the heads of all Federal departments and agencies to explore opportunities for collaboration both within Government and with the private sector to improve child care quality and affordability in Federally sponsored settings.

Finally, employers have a responsibility to make sure that their workers are better informed on child care and the options available to them at the national, State, and local levels. I therefore direct the Director of the Office of Personnel Management ("Director") to ensure that, to the fullest extent possible, all Federal workers receive full information about child care benefits available to them on the Federal, State, and local levels, including information on resource and referral networks, available tax credits such as the Child and Dependent Care Tax Credit and Child Tax Credit, as well as public subsidies. The Director shall also host a nationwide summit designed to showcase model public and private sector solutions to child care needs.

WILLIAM J. CLINTON

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ATTACHMENT 5

STATEMENT OF PERSONAL HISTORY

(See Privacy Act statement on page 4)

OMB No. 3090-0006
Expires 09/30/97

Public reporting burden for this collection of information is estimated to average 8 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Security Division (PSS), Office of Federal Protective Service, GSA, Washington, DC 20405; and to the Office of Management and Budget, Paperwork Reduction Project (3090-0006) Washington, DC 20503.

NOTE: All sections must be completed. If more space is needed for any item, continue under Item 23.

1. SOCIAL SECURITY NUMBER

2. NAME DATA *(Give your full name. Initials and abridgements are not acceptable)*

NAME *(Last, first, middle)*

3. DATE OF BIRTH

OTHER NAMES USED *(Maiden name, names by former marriages, former name changed legally or otherwise, nicknames, etc. Specify which, and show dates used.)*

4. PLACE OF BIRTH

* ONLY CIRCLED ITEMS NEED TO BE COMPLETED.

5. SEX ☐ MALE ☐ FEMALE

6. HEIGHT

7. WEIGHT

8. COLOR EYES

9. COLOR HAIR

10. MARITAL STATUS
- ☐ SINGLE
- ☐ WIDOW(ER)
- ☐ MARRIED
- ☐ DIVORCED

11. IF MARRIED, WIDOWED, OR DIVORCED, GIVE FULL NAME AND DATE AND PLACE OF BIRTH OF SPOUSE OR FORMER SPOUSE, AND DATE AND PLACE OF MARRIAGE. INCLUDE WIFE'S MAIDEN NAME *(Give same information regarding all previous marriages.)*

12. RACE *(Check one)*

A – Asian or Pacific, including Chinese, Japanese, Filipinos, Polynesians, Indonesians, and Asian Indians	H – Hispanic
B – Black	W – White
I – American Indian or Alaskan Native, including Eskimos	O – Other

13. DATES AND PLACES OF RESIDENCE *(If actual places of Residence differ from the Mailing addresses, furnish and identify both by placing "R" (for residence) or "M" (for mailing) in column "R/M". Begin with present and go back (10) years. Continue in Item 23 if necessary.)*

R/M	FROM	TO	NUMBER AND STREET	CITY	STATE	ZIP CODE (5+4)

14. MILITARY SERVICE *(Past or present)*

SERIAL NO. *(If none, give grade or rating at separation.)*	BRANCH OF SERVICE *(Army, Navy, Air Force, etc.)*	YEAR FROM	YEAR TO

15. CHECK

U.S. CITIZEN	BY BIRTH	A. CERT. NO.	B. PETITION NO.	C. DATE	D. PLACE AND COURT
	NATURALIZED *(Complete A thru D)*				
	DERIVED *(Complete E)*	E. PARENT'S CERTIFICATION NUMBERS			
ALIEN	REGISTRATION NO.	NATIVE COUNTRY		DATE OF ENTRY	PORT OF ENTRY

16 EDUCATION *(All schools above elementary)*

NAME OF SCHOOL	ADDRESS	YEAR FROM	YEAR TO	DEGREES

17 EMPLOYMENT *(List employment dates starting with your present employment for the last ten (10) years. Show ALL dates and addresses when unemployed. Give name under which employed if different from name now used.)*

FROM	TO	NAME OF EMPLOYER *(Firm or agency)* AND NAME OF SUPERVISOR	TYPE OF WORK	ADDRESS *(Where employed)*	REASON FOR LEAVING

18a. HAVE YOU EVER BEEN DISMISSED OR FORCED TO RESIGN FROM ANY POSITION FOR CAUSE?

☐ YES ☐ NO *(If answer is "YES," furnish details in Item 23)*

18b. HAVE YOU EVER BEEN DISCHARGED FROM THE ARMED FORCES UNDER OTHER THAN HONORABLE CONDITIONS?

☐ YES ☐ NO *(If answer is "YES," furnish details in Item 23)*

19. HAVE YOU EVER BEEN ARRESTED, CHARGED, OR HELD BY FEDERAL, STATE, OR OTHER LAW-ENFORCEMENT AUTHORITIES FOR ANY VIOLATION OF ANY FEDERAL LAW, MILITARY LAW, STATE LAW, COUNTY OR MUNICIPLE LAW, REGULATION, OR ORDINANCE? *(Do not include traffic violations for which a fine of $25 or less was imposed. All other charges must be included even if they were dismissed.)*

☐ YES ☐ NO *(If answer is "YES," give full details below)*

REASON CHARGED OR HELD	DATE	PLACE WHERE CHARGED OR HELD	DISPOSITION

BEST COPY AVAILABLE

20. HAVE YOU EVER BEEN ARRESTED, CHARGED, OR HELD BY FEDERAL, STATE, OR OTHER LAW-ENFORCEMENT AUTHORITIES FOR ANY CRIME OR OFFESE INVOLVING A CHILD? *(All other charges must be included in Item 19 even if they were dismissed.)*

☐ YES ☐ NO *(If answer is "YES", give full details below)*

REASON CHARGED OR HELD	DATE	PLACE WHERE CHARGED OR HELD	DISPOSITION

21 RELATIVES *(Parents, spouse, divorced spouse, children,brothers, and sisters, living or dead. Name of spouse should include maiden name and any other names by previous marriage. If person is deceased, so state under "Address" and enter other information at time of death.)*

RELATION	NAME IN FULL	YEAR OF BIRTH	ADDRESS	COUNTRY OF BIRTH	PRESENT CITIZENSHIP

22 REFERENCES *(Name three persons, not relatives or employers, who are well acquainted with you.)*

NAME	ADDRESS		YEARS KNOWN

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23 SPACE FOR CONTINUING ANSWERS TO OTHER QUESTIONS *(Show item numbers to which answers apply. Attach a separate sheet if there is not enough space here.)*

24 AUTHORIZATION AND RELEASE	I hereby authorize the General Services Administration to obtain any information required from the Federal government of state agencies, including but not limited to, the Federal Bureau of Investigation (FBI), the Defense Investigation Service (DIS), the U.S. Office of Personnel Management (OPM), the Immigration and Naturalization Service (INS), (if applicable), and from the State Criminal History Repository (child care employees only) of each State where I have resided. I have been notified of any employer's obligation to require a criminal history records check as a condition of employment and of my right to obtain a copy of the criminal history report by writing to the General Services Administration, Freedom of Information Officer. I understand that I have a right to challenge the accuracy and competencies of any information contained in the report. I also understand that this information will be treated as privileged and confidential information. Case files are handled under the procedures for safeguarding records outlined in the Handbook, General Services Administration Privacy Act Program (OAD P 1878.8). I release any individual, including records custodians, any component of the U.S. Government, or the individual State Criminal History Repository supplying information, from all liability for damages that may result on account of compliance or any attempts to comply with this authorization. This release is binding, now and in the future, on my heirs, assigns, associates, and personal representative(s) of any nature. Copies of this authorization that show my signature are as valid as the original release signed by me.
25 PRIVACY ACT OF 1974 COMPLIANCE INFORMATION	**Privacy Act of 1974 Compliance Information.** Solicitation of information contained herein is authorized by Executive Order 10450, and/or Section 231 of the Crime Control Act of 1990 (42 U.S.C. 13041), and may be used as a basis for suitability determinations. Your social security number is being requested pursuant to Executive Order 9397. Disclosure of the information by you is voluntary. Information may be transferred as a routine use to appropriate federal, state, local, or foreign agencies when relevant to civil, criminal or regulatory investigations or prosecutions, or pursuant to a request by GSA or such other agency in connection with the hiring or retention of an employee, the issuance of a security clearance, the investigation of an employee, the letting of a contract, or the issuance of a license, grant, or other benefit. Information also may be transferred as a routine use to a duly authorized official engaged in investigation or settlement of a grievance, complaint, or appeal filed by an employee. Failure to provide information requested on this form may result in the government's inability to determine your suitability for the position applied for or occupied, and may affect your prospects for employment or continued employment under a government contract, or at a federal facility, or with a government license.
26 CERTIFICATION	FALSE STATEMENTS ARE PUNISHABLE BY LAW AND COULD RESULT IN FINES OF UP TO $2000 AND IMPRISONMENT UP TO FIVE YEARS I declare under penalty of perjury that the statements made by me on this form are true, complete and correct.

Before signing this form, check back over it to make sure you have answered all questions fully and correctly.

SIGNATURE	DATE

GSA FORM 176 PAGE 4 (REV 12-95)

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PRE-EMPLOYMENT
BACKGROUND CHECK
CERTIFICATION SHEET

TO BE USED FOR CHILD CARE CENTERS ON GSA CONTROLLED PROPERTY

The information on this form is to be used in conjunction with GSA Form 176. The revised GSA Form 176 will be used to conduct a criminal history background check performed by the GSA Federal Protective Service in conformance with the requirements of the Crime Control Act Pub.L. 101-647, as amended by Pub.L. 102-190. This form is to be used by the employer to ensure a thorough background check has been conducted.

A pre-employment background check has been conducted on the following employee:

NAME: _____

☐ Education: Educational credentials and such certificates or diplomas as required are in the employee's personnel file.

☐ Work History: The employee's employment history record has been verified.

☐ References: Personal references have been checked.

☐ State Check: Appropriate State background check per licensing requirements has been initiated. (If clearance already received attach copy.)

I certify that the above minimum pre-employment checks have been completed and properly documented.

_____ _____

Signature Date

_____

Title

June 14, 1999

MEMORANDUM FOR ASSISTANT REGIONAL ADMINISTRATORS
PUBLIC BUILDINGS SERVICE

REGIONAL DIRECTORS
FEDERAL PROTECTIVE SERVICE

THRU: CLARENCE EDWARDS ASSISTANT COMMISSIONER
FEDERAL PROTECTIVE SERVICE

FROM: PAUL CHISTOLINI
DEPUTY COMMISSIONER
PUBLIC BUILDINGS SERVICE

SUBJECT: Protective Window Glazing in Child Care Centers

It is the responsibility of the regions to ensure compliance with the DOJ Vulnerability Assessment Report's minimum-security standards and the ISC Security Criteria specifications pertaining to window protection in child care centers located in GSA controlled facilities. Toward that end, Regions 2 and 9 piloted a blast mitigation program that took into account the site specific criteria related to each child care center located in their regions. With this information, decisions can now be made about the type and level of mitigation required on a case by case basis.

These pilot programs involved the pairing of a regional Physical Security Specialist (PSS) with an engineer with appropriate blast or structural experience, along with any other specialists required for the particular site. The responsibility of the PSS is to analyze the security profile of each facility to determine if the window protection meets the minimum-security standard criteria.

In cases where it was determined that the window symptoms did not meet minimum standards, an analysis was made to determine acceptable alternatives to minimize glass fragment hazards. Window protection design and/or specifications are in the process of being developed for each of those Child Care Centers that required remediation.

Each of the other regions should now implant a similar program by assembling their own regional Copies of the reports from the two pilot regions along with telephone numbers of team members are attached. In addition, a draft specification for procuring the needed window glazing is attached. Initial finding far these projects was distributed last August with some limited funding given this year. Any additional funding requests should be forwarded to Wade Belcher (202-501-1771), who

will be the point of contact for this effort. It is hoped that the necessary upgrades can be substantially completed by September 30, 1999.

In addition, since the effective life cycle of window film is approximately 7 years, each region should have a system in place to track the appropriate inspection/repair/replacement of the film at each child care center location.

design

GSA has set standards for design and finishes for our centers. Our requirements are written in: PBS - P140, Child Care Center Design Guide. This guide should be in your field office. The guide is very comprehensive and is used mainly for our new projects but you should be able to find useful guidance and requirements for smaller projects as well. Check the table of contents or the index to find discussion on the elements you need.

You may access the design guide on the Web at the following address: http://www.gsa.gov/pbs/centers/child - click on "Learn more about....", then click on the Library crayon to locate the guide.

playgrounds

The field office maintains playground equipment. An annual playground check by a local professional, or the field office personnel, is a good idea. This check can identify for us any structural problems and help identify any new or undetected entrapment areas. Playground maintenance can be built into your maintenance contract.

Your field office should have available a playground entrapment kit with templates and instructional video. This kit is in a small green duffel bag.

A large part of playground maintenance is making sure the fall zone is adequately maintained. Proper depth must be maintained on all loose fill materials such as wood chips, wood mulch, plastic and rubber pellets, etc. Plan for additional fill material to replenish your fall zone areas.

Our playground standard is the Consumer Product Safety Commission, "Handbook for Public Playground Safety". You can locate this handbook on the CPSC website at http://www.cpsc.gov, or place your hard copy in this section.

Good playgrounds include living things: plants, bushes, trees and grass. Maintenance of the landscaping on the playground is the responsibility of the field office. Talk to your RCCC if you need additional plantings. The RCCC can help make sure the plants are appropriate and non-toxic. Any fertilizer or weed killers you want to use in the playground and around the area must be labeled as non-restricted use.

Your cleaning contract should include the playground. Trash pick-up is required as well as periodic cleaning of climbing structures and slides. This includes power washing of surfaces including the synthetic fall zones that are usually poured in place, or rubber mats that are linked together.

General Services Administration
Public Buildings Service
Washington, DC 20405

MAY 18 1995

MEMORANDUM FOR REGIONAL DIRECTORS
REAL PROPERTY MANAGEMENT AND SAFETY -
1PM, 2PM, 3PM, 4PM, 5PM, 6PM, 7PM, 8PM,
9PM, 10PM, WPM

FROM: JAMES F. STEELE, JR.
ASSISTANT COMMISSIONER
PROPERTY MANAGEMENT PM

SUBJECT: New/Revised Maintenance Guide Cards and
Moratorium for Building Workloads

Attached are updated maintenance standards and guides. They include: (1) list of maintenance standards with changes, additions, and deletions; (2) a section on maintenance practices and general issues; (3) guide cards which have been added or modified; and (4) a floppy disc with these files in Word and formatted in MS-DOS.

All "E" and "F" cards have been updated. There are several new cards including: boiler, elevator and roof inspection; plate heat exchanger; underground storage tank; UPS batteries; motor predictive maintenance; day care center playground equipment; and cafeteria kitchen equipment guide cards. This information is provided to the Property Management organizations to permit and aid in the issuance of all contract specifications including but not limited to indefinite quantity, operation and maintenance, commercial facility management, elevator maintenance, small purchase, and short form specifications. Central office will continue the process of maintaining and updating the preventive maintenance guide card system as changes dictate.

However, these cards are not to be used as a basis for providing justification to increase workload force account or contract equivalent hours. Additional work effort as a result of implementing revised or new guide card standards must be contracted out or accomplished by realigning existing in-house or contract workloads.

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The regions may continue to receive and review workloads from the field offices, however, they are no longer required to transmit workloads to central office for review. As of the date of this memorandum, Central Office will not request revised workloads for review and approval except for delegated locations.

Once again, the only change the regions are responsible for as a result of this memorandum is the fact that they will no longer be required to submit workloads (other than delegated buildings) to central office for review and approval.

If there are any questions, please contact Mr. Wayne Daniels, National Representative for Buildings Maintenance, Regional Customer Service Team 2 (PM-2), on (202) 219-0086.

Attachments

K-9 Play Structure.
Carriages and Buggies

Frequency: Annual

Application:

This maintenance guide applies to GSA facility day care centers playground equipment, primarily for preschool children.

Special Instructions:

1. Unsafe conditions found during this maintenance shall be immediately brought to the attention of the child care center operator and the buildings manager. Secure the equipment or area from further use immediately.
2. Responsibility for correction of deficiencies may fall to others, such as the child care provider, cleaning and lawn maintenance programs, or field office manager/child care coordinator. Findings shall be reported to the appropriate manager.
3. Be particularly alert to potential entrapment hazards in playground equipment.

Check Points:

1. Check handles and toddler restraint straps. Make certain they are in good condition and securely fastened to the buggy.
2. Check hand/foot brakes for proper operation and braking effectiveness.
3. Ensure that all nuts and bolts are properly tightened.
4. Lubricate moving parts as appropriate.
5. Check the frame for structural deformities, and especially sharp corners/edges.
6. Check for cracks around the weight bearing sections and around structure near bolt holes/rivets.
7. Check the wheels and axles. Ensure the wheels are in good condition and properly attached to the axle, and axle properly attached to buggy.
8. All surfaces that are painted or treated must use non leaded, non harmful materials.

K-9 Play Structure.
Carriages and Buggies

Frequency: Annual

Recommended Tools, Materials, and Equipment:

1. Standard Tools - Basic.
2. Anti-entrapment kit.

K-9 Play Structure.
Carriages and Buggies

Frequency: Annual

K-8 Structure,
Playhouse, Garden, and Manipulatives

Frequency: Annual

Application:

This maintenance guide applies to GSA facility day care centers playground equipment, primarily for preschool children.

Special Instructions:

1. Unsafe conditions found during this maintenance shall be immediately brought to the attention of the child care center operator and the buildings manager. Secure the equipment or area from further use immediately.
2. Responsibility for correction of deficiencies may fall to others, such as the child care provider, cleaning and lawn maintenance programs, or field office manager/child care coordinator. Findings shall be reported to the appropriate manager.
3. Be particularly alert to potential entrapment hazards in playground equipment.

Check Points:

1. Playhouse.
    a. Securely fasten all joints.
    b. Remove sharp corners, edges, or projections from all surfaces. Ensure that surfaces are non abrasive.
    c. All surfaces that are painted or treated must use non leaded, non harmful materials.
    d. Note whether play houses are open enough to allow easy visual and quick access by an adult play leader.
    f. Playhouses in trees (tree houses) must be securely fastened on major large branches.
2. Wheel/Riding Toys.
    a. Tightened all nuts and bolts on wheel toys.
    b. Lubricate all moving parts on wheel toys.
    c. Follow other additional manufacturer instructions for maintenance, if provided.
    d. Remove sharp corners, edges, or projections from all surfaces. Ensure that surfaces are non abrasive.
    e. All surfaces that are painted or treated must use non leaded, non harmful materials.

K-8 Structure,
Playhouse, Garden, and Manipulatives

Frequency: Annual

3. Gardens. Weed and mulch the gardens as needed.
4. Manipulatives.
    a. Remove all sharp comers, edges, or projections from wooden blocks and other manipulatives.
    b. Lubricate all moving parts on smaller wheel toys.

Recommended Tools, Materials, and Equipment:

1. Standard Tools - Basic.
2. Anti-entrapment kit.

K-8 Play Structure.
Playhouse, Garden, and Manipulatives

Frequency: Annual

K-7 Play Structure.
Signs, Trees. and Pathways

Frequency: Semiannual

Application:

This maintenance guide applies to GSA facility day care centers playground equipment, primarily for preschool children.

Special Instructions:

1. Unsafe conditions found during this maintenance shall be immediately brought to the attention of the child care center operator and the buildings manager. Secure the equipment or area from further use immediately.
2. Responsibility for correction of deficiencies may fall to others, such as the child care provider, cleaning and lawn maintenance programs, or field office manager/child care coordinator. Findings shall be reported to the appropriate manager.
3. Be particularly alert to potential entrapment hazards in playground equipment.

Check Points:

1. Signs. Check all signs and ensure that they are properly mounted, in good repair, and legible. Repair or replace as needed.
2. Trees and Shade Structures.
    a. Note whether the trees block the prevailing, provide proper shade within the limits of the play structure borders, and shade structures such as slide surfaces and sand areas.
    b. Rake and remove leaves from the site.
    c. Trim and maintained trees.
    d. Ensure that all tree houses are securely fastened.
    e. Note whether adult seating is provided near the play areas.
    f. Check and clean the fountain head and base. Remove all sharp comers, edges, or projections. Verify that the drinking fountains are cleaned in accordance with the building plan (should be daily).
3. Pathways.
    a. Free pathways from weeds and other growth.
    b. Note whether pathways are wide enough for the widest wheel toy.

K-7 Play Stricture.
Signs, Trees. and Pathways

Frequency: Semiannual

Recommended Tools, Materials, and Equipment:

1. Standard Tools - Basic.
2. Anti-entrapment kit

K-7 Play Stricture.
Signs, Trees. and Pathways

Frequency: Semiannual

K-6 Play Structure.
Sand and Water Play Equipment

Frequency: Monthly

Application:

This maintenance guide applies to GSA facility day care centers playground equipment, primarily for preschool children.

Special Instructions:

1. Unsafe conditions found during this maintenance shall be immediately brought to the attention of the child care center operator and the buildings manager. Secure the equipment or area from further use immediately.
2. Responsibility for correction of deficiencies may fall to others, such as the child care provider, cleaning and lawn maintenance programs, or field office manager/child care coordinator. Findings shall be reported to the appropriate manager.
3. Be particularly alert to potential entrapment hazards in playground equipment.

Check Points:

1. Designated Sand Play Area.
    a. Ensure that there is adequate drainage provided to prevent collection of water.
    b. Ensure all sand play area boundary pints and fasteners are secured.
    c. Remove all sharp corners and edges from the sand play area structure.
    d. Replenish the sand as needed.
    e. Note whether there is an elevated sand play area for wheel chair access (e.g., sand table).
    f. The sand play area must be covered when not in use to prevent access to animals. Note whether there is a serviceable cover available.
    g. Note whether adult seating is being provided near the sand play area.
2. Designated Water Play Area.
    a. Remove all lime or water mineral build-ups on the spray heads.
    b. Lubricate movable parts for water clues or water wheels, using a safe, non toxic lubricant.
    c. Repair as needed all standing water areas fences and gates to ensure the area is secured when inadequately supervised.
    d. Free the water play area structure from all sharp corners and edges.

K-6 Play Structure.
Sand and Water Play Equipment

Frequency: Monthly

e. Note whether there is an elevated water play area for wheel chair access (e.g., water table).

f. Ensure that there is adequate drainage provided to prevent unwanted collection of water.

g. Note whether adult seating is be provided near the water play area.

Recommended Materials and Equipment:

1. Standard Tools - Basic.
2. Anti-entrapment kit

K-6 Play Structure.
Sand and Water Play Equipment

Frequency: Monthly

K-5 Play Structure,
Rotating, Spring Rocking,
and Seesaws

Frequency: Monthly

Application:

This maintenance guide applies to GSA facility day care centers playground equipment, primarily for preschool children.

Special Instructions:

1. Unsafe conditions found during this maintenance shall be immediately brought to the attention of the child care center operator and the buildings manager. Secure the equipment or area from further use immediately.
2. Responsibility for correction of deficiencies may fall to others, such as the child care provider, cleaning and lawn maintenance programs, or field office manager/child care coordinator. Findings shall be reported to the appropriate manager.
3. Be particularly alert to potential entrapment hazards in playground equipment.

Check Points

1. Merry-go-round, Swinging Gates.
    a. Level and firmly secure the support structure in the ground as needed.
    b. Ensure that all pints and fasteners are secure and covered to prevent a child from coming into contact with them.
    c. Ensure that the structure is free from all sharp comers and edges.
    d. All open spaces in the center of the structure between the center post and the outer perimeter must be covered.
    e. Lubricate all moving parts with a non toxic lubricate.
    f. The structure may not have moving parts which create a shearing action that could sever or crush body parts. (if installed, they are usually underneath.) All structures that have a shearing action shall be removed.
    g. Ensure that the gear box is covered.
    h. - There must be a minimum of 20 feet of cleared running space surrounding the structure to be used for getting off.
2. Spring Rocking Equipment
    a. Ensure that the support structure is firmly secured in the ground.

K-5 Play Structure,
Rotating, Spring Rocking,
and Seesaws

Frequency: Monthly

b. Ensure all joints and fasteners are secured and covered to prevent a child from coming into contact with them.

c. Remove any sharp corners, edges, or projections.

3. Seesaw Equipment

a. Ensure that the support structure is firmly secured in the ground.

b. Ensure all joints and fasteners are secured and covered to prevent a child from coming into contact with them.

c. Remove any sharp corners, edges, or projections.

d. All nuts and bolts must be countersunk

e. Lubricate all moving pads with a non toxic lubricant.

f. All moving parts must be covered to eliminate pinch points for fingers, hands, feet.

g. Ensure that there is a cushioning surface (e.g., tire) under each end of the seesaw where it would normally come in contact with the ground.

h. Ensure that the overall height of the seesaw at the top of the arc is less than 4 feet

i. Ensure all hand holds are 3 inches in length.

Recommended Tools, Materials, and Equipment

1. Standard Tools - Basic
2. Anti-entrapment kit

K-5 Play Structure,
Rotating, Spring Rocking,
and Seesaws

Frequency: Monthly

K-4 Play Structure.
Climbing Equipment

Frequency: Monthly

Application:

This maintenance guide applies to GSA facility day care centers playground equipment, primarily for preschool children.

Special Instructions:

1. Unsafe conditions found during this maintenance shall be immediately brought to the attention of the child care center operator and the buildings manager. Secure the equipment or area from further use immediately.
2. Responsibility for correction of deficiencies may fall to others, such as the child care provider, cleaning and lawn maintenance programs, or field office manager/child care coordinator. Findings shall be reported to the appropriate manager.
3. Be particularly alert to potential entrapment hazards in playground equipment.

Check Points:

1. General Climbing Equipment.
    a. Ensure that all support structures are securely anchored in the ground.
    b. All footings must be covered sufficiently to prevent injury.
    c. Securely fasten all nuts and bolts.
    d. Close all open holes (e.g., at the end of pipes). They should be covered/capped with smooth edges to prevent children from cutting their fingers.
    e. Remove spaces which could entrap hands or fingers .
    f. Ensure that the structure is free of sharp corners, edges, protrusions, splinters, and other defects that could injure a child.
    h. Ensure that all platforms 4 feet or higher are enclosed with guard rails.
    i. If the structure has openings between 4.5 inches and 9 inches, initiate a work order to redesign the parts to be less than 4.5 inches or greater than 9 inches, and remove the equipment from service. For younger preschool children, these dimensions may need to be reduced.
2. Chain/Rope
    a. Ensure that chains are covered to eliminate pinch points.
    b. Replace chain if links show wear.
    c. Replace all ropes that are frayed or showing wear.
    d. Replace all worn pans which connect rope to the structure, and cover all pinch points.

K-4 Play Structure.
Climbing Equipment

Frequency: Monthly

e. Lubricate the assembly which attaches chain/rope to the structure with a non toxic lubricant and ensure the area is covered to prevent the hands/fingers of a child from coming into contact with the lubricant.

3. Horizontal Ladders

a. Ensure that all footings cemented under the around are at least 6 inches.

b. Ensure that there is at least 8 inches of ground cover under the structure to protect against falls.

4. Stairways.

a. Ensure all stairway bolts must be fastened securely, including' those which are used to attach it to the structure.

b. Ensure all bolts are covered and or were installed in a manner that the children cannot come into contact with them.

5. Geodesic Domes.

a. Fasten all stairway bolts securely.

b. Fastened all nuts and bolts securely.

c. Ensure that there is at least 8 inches of suitable ground cover, such as sand, under the structure to protect against falls.

6. Climbing Poles.

a. Ensure that all pole footings are cemented under the ground at least 6 inches. Initiate a work order if necessary to correct.

b. Fastened all connections at the top of the pole securely and cover any areas that could be pinch points.

c. Ensure that there is at least 8 inches of suitable ground cover, such as sand, under the structure to protect against falls.

7 Balance Beams.

a. Ensure that all balance beam footings are cemented under the ground at least 6 inches.

b. Remove all protrusions found at the connecting points.

c. Sand all rough edges sm ooth.

d. Ensure that there is at least 8 inches of suitable ground coven, such as sand, under the structure to protect against falls.

8. Chinning Bars.

a. Ensure that all chinning bar footings are cemented under the ground at least 6 inches.

b. Fasten all nuts and bolts securely.

c. Ensure that all nuts and bolts are properly installed and covered to prevent a child from coming in contact with them. Cover as needed to accomplish satisfactory protection.

d. Ensure that all horizontal bars are perpendicular to the uprights.

e. Ensure that there is at least 8 inches of suitable ground cover, such as sand, under the structure to protect against falls.

K-4 Play Structure.
Climbing Equipment

Frequency: Monthly

9. Parallel Bars.

a. Ensure that all parallel bar footings are cemented under the ground at least 6 inches.

b. Ensure that all nuts and bolts are properly installed and covered to prevent a child from coming in contact with them. Cover as needed to accomplish satisfactory protection.

c. Fastened all nuts and bolts securely.

d. Ensure that there is at least 8 inches of suitable ground cover, such as sand, under the structure to protect against falls.

10. Bridges

a. Ensure that all bridge footings are cemented under the ground at least 6 inches.

b. Fastened all nuts and bolts securely.

c. Ensure that all nuts and bolts are properly installed and covered to prevent a child from coming in contact with them. Cover as needed to accomplish satisfactory protection.

d. Ensure that all bridge pinch points are covered.

e. Ensure that there is at least 8 inches of suitable ground cover, such as sand, under the structure to protect against falls.

Recommended Tools, Materials, and Equipment

1. Standard Tools-Basic.
2. Anti-entrapment kit

K-4 Play Structure.
Climbing Equipment

Frequency: Monthly

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K-1 Play Structure, Surfacing, Location and Accessibility, Size, and Placement, and Storage Area, Maintenance Worksheet

Frequency: Monthly

Application:

This maintenance guide applies to GSA facility day care centers playground equipment, primarily for preschool children.

Special Instructions:

1. Unsafe conditions found during this maintenance shall be immediately brought to the attention of the child care center operator and the buildings manager. Secure the equipment or area from further use immediately.
2. Responsibility for correction of deficiencies may fall to others, such as the child care provider, cleaning and lawn maintenance programs, or field office manager/child care coordinator. Findings shall be reported to the appropriate manager.
3. Be particularly alert to potential entrapment hazards in playground equipment

Check Points:

1. Surfacing.
   a. Check that surfaces underneath play structures where falls are likely to occur are constructed of a resilient (force-absorbing) material. Under-structure surfaces made of concrete, asphalt, or packed dirt should be removed, or covered with resilient material.
   b. Composite loose surfaces shall be at least 6 inches in depth at the shallowest point under equipment of 4 feet or less.
   c. Check to see if composite loose surfaces deeper than 6 inches under structures are higher than 4 feet. The depth should be proportional to the height. Composite loose surfacing shall be replenished on a regular basis as play activity by children necessitates.
   e. Check to see if composite loose surfacing is surrounded by containment barriers.
      1). Containment barriers shall be at least 6 inches higher than the composite loose surfacing.
      2). Containment barriers shall be surrounded by a 5 feet maintenance zone.
      3). The maintenance zone shall contain material to allow settling and clean up of child carried composite loose surfacing.
   f. Containment barriers shall be visible enough to prevent trips.
2. Locations and Accessibility.
   a. Check fence surrounding the playground. It should be at least 4 feet in height, and the fence posts must be secured in the ground.
   b. Grease the gate hinges semiannually with non toxic lubricant.

K-1 Play Structure,
Surfacing, Location and
Accessibility, Size, and Placement,
and Storage Area, Maintenance Worksheet

Frequency: Monthly

3. Size and Placement of Equipment
   a. Individual pieces of equipment should be at least 10 feet apart.
   b. Any exposed concrete footings should be covered with 6 inches of sand.
   c. Equipment should be placed to avoid crossing traffic patterns which could lead to injury.
   d. Equipment for infants or toddlers shall placed in a separate area.
   e. The areas for infants and toddlers shall be separated from the older children by a fence or barrier which effectively prevents crossover. Consult daycare operator to properly define these areas.
4. Ensure that storage areas adjacent to the play areas are locked.

Recommended Tools, Materials, and Equipment:

1. Standard Tools-Basic
2. Anti-entrapment kit.

K-1 Play Structure,
Surfacing, Location and
Accessibility, Size, and Placement,
and Storage Area, Maintenance Worksheet

Frequency: Monthly

K-2 Play Structure,
Sliding Equipment

Frequency: Quarterly

Application:

This maintenance guide applies to GSA facility day care centers playground equipment, primarily for preschool children.

Special Instructions:

1. Unsafe conditions found during this maintenance shall be immediately brought to the attention of the child care center operator and the buildings manager. Secure the equipment or area from further use immediately.
2. Responsibility for correction of deficiencies may fall to others, such as the child care provider, cleaning and lawn maintenance programs, or field office manager/child care coordinator. Findings shall be reported to the appropriate manager.
3. Be particularly alert to potential entrapment hazards in playground equipment

Check Points:

1. Slides, General
    a. Check for missing or broken parts.
    b. Check for sharp corners, edges, or projections.
    c. Check that all footings are firmly underground.
    d. Check that single wide slides are replaced with double wide slides.
    e. Check that the slide surface is smooth.
    f. Touch up or repaint the slide surface if required, using lead free non toxic paint.
    g. For slides over 4 feet, ensure that the bottom of the slide forms an exit chute which decreases in angle from the rest of the slide surface.
    h. The overall height of the slide should not exceed the total of 2.5 times the tallest child in the group.
2. Hill Slides. The hill slide shall have dirt under and around it so the slide surface is supported and secure.
3.Spiral and Tunnel Slides. Some part of the child must be visible throughout the descent. Remove slides where children disappear from view during descent.
4. Tighten all fasteners, nuts, and bolts.
5. Check that equipment is securely fastened to its foundation, if applicable.
6. Check that foundation is stable to avoid tipping the structure.
7. Ensure all surfaces where connections are made are covered to prevent fingers from getting caught or pinched. Examples: Slide to platform and ladder to platform.

K-2 Play Structure,
Sliding Equipment

Frequency: Quarterly

Recommended Tools, Materials, and Equipment:

1. Standard Tools - Basic.
2. Anti-entrapment kit.

K-2 Play Structure,
Sliding Equipment

Frequency: Quarterly

K-3 Play Structure,
Swing

Frequency: Monthly

Application:

This maintenance guide applies to GSA facility day care centers playground equipment, primarily for preschool children.

Special Instructions:

1. Unsafe conditions found during this maintenance shall be immediately brought to the attention of the child care center operator and the buildings manager. Secure the equipment or area from further use immediately.
2. Responsibility for correction of deficiencies may fall to others, such as the child care provider, cleaning and lawn maintenance programs, or field office manager/child care coordinator. Findings shall be reported to the appropriate manager.
3. Be particularly alert to potential entrapment hazards in playground equipment.

Check Points:

1. To and Fro Swings.
    a. Check that seats are of soft material like plastic or rubber. All metal or wooden seats must be replaced.
    b. Check that swings for tots and swings for older children are hung on separate structures.
    c. Check that a barrier should be in front of or behind the action of the swings to prevent running into a moving swing.
    d. Securely fasten all supports in the ground.
    e. Any exposed concrete footings should be covered with 6 inches of sand.
    f. Ensure that rough edges are not exposed to children.
    g. Verify that all metal surfaces are painted with unleaded, non toxic paint.
    h. Verify that all swing chains covered to prevent pinches.
    i. Lubricate as necessary, all moving pads of the swing according to manufacturer's specifications.
    j. Tighten all nuts and bolts
    k. Check that foundation is stable to avoid tipping the structure.
2. Tire Swings.
    a. Ensure that the fulcrum or center point on the swing is in the center of the horizontal beam.
    b. Ensure that the vertical uprights are placed away from the structure at a distance equal to or greater than the radius of the swing arc.
    c. Lubricate as necessary the swivel moving assembly.

K-3 Play Structure,
Swing Maintenance

Frequency: Monthly

d. If the swivel moving assembly is wearing through its support, correct the deficiency. Ensure assembly is covered so that fingers do not get pinched or caught.

3. Tot Swings.
   a. Ensure that all sides of each tot swing are structurally safe.
   b. Ensure that all hooks which close the seats to the sides are securely latched.
   c. Ensure there are no areas for fingers to get caught or pinched.

Recommended Tools. Materials. and Equipment:

1. Standard Tools - Basic.
2. Anti-entrapment kit

K-3 Play Structure,
Swing Maintenance

Frequency: Monthly

ROLES AND RESPONSIBILITIES IN REGARD TO THE FEDERAL CHILD CARE CENTER

GSA:
Sets policy for the child care program nationwide. Provides finished space, services, utilities and equipment to the center. GSA conducts background checks on center staff, sets and oversees quality standards thru a license agreement. GSA trains and provides materials for boards, agencies and operators.

TENANT AGENCIES:
Sponsor the center for their employees and pay rent, assigned as joint use space. May appoint board members, provide direction to the boards, allocate resources, provide recycling funds, and provide space for fund-raising activities.

BOARD OF DIRECTORS:
The mission of the board is to make quality child care available to federal employees and others in the local commuting area. Specific tasks are to support the program, fund-raise, administer a tuition assistance program, help market the center, serve as a liaison among the government, the provider, and the parents, and monitor center goals and board effectiveness.

OPERATOR:
Operate a high quality, state licensed, and NAEYC accredited child care center; this includes: hiring staff, establishing curriculum, collecting fees, marketing the center, maintaining liability insurance, and serving the families.

STATE AND/OR LOCAL LICENSING AUTHORITIES:
Set minimum quality standards for child care centers, insure compliance and investigate complaints. Inspect the centers, including health, program, and fire safety inspections.

child care providers

There are 113 child care centers operating in GSA space across the country, and more are in the planning stages.

Our child care centers are managed by independent companies. These companies can be either for profit or non-profit organizations. We have a mix of large (national firms) and small (local) for profit, and non-profit organizations in our space.

Child care operators are not under any government contract. GSA uses Form 1582 Revocable License for Use of Space by a non-Federal Entity, with Special Conditions, as the legal vehicle to put child care in our buildings. The choice of a child care provider rests with the local board of directors. The board may choose operators within the acceptable range of GSA. In child care, continuity is prized. It is detrimental to change operators unless there is good reason.

GSA has by law (490b) the oversight responsibility for the child care centers in our buildings. We have set requirements for the centers to meet (the license document). These include most importantly attaining accreditation by the National Association for the Education of Young Children (NAEYC). Any operator in our space must achieve and maintain accreditation, and be licensed by the state. In some instances there are also city or local licenses required.

cost and quality

GSA does not control the cost of care. The operator will set the weekly or monthly fees. The board of directors has a role in reviewing the operator's budget. The largest cost in child care is the staff. The centers in our space should have a budget that reflects 70%-80% of costs as staff salaries and benefits.

In general, center space (which the government provides at no cost to the operator) can reflect between 5% and 25% of a child care center's budget. The low end reflects centers that receive free or subsidized space. The high end reflects suburban centers where they have building construction costs, or rental costs. Our initial belief, when we first put child care in our space was that if we provided as much as 25% of a center's budget (by providing the facility), than we would see a reduction in fees of equal measure. This belief was based on the assumption that the available child care market was of acceptable quality. We subsequently learned that the majority of child care centers offer mediocre care at best, which was not something we wanted to duplicate.

Since the government subsidy is not enough to bridge the gap between quality and low cost, we have focused our space subsidy on improved quality as measured by NAEYC accreditation. Additional tools to insure quality are the program review and a health review performed by independent childcare experts that are available for the RCCC to use as needed.

Realizing the cost is too high for many families to afford, we have charged the local childcare boards with fundraising and tuition assistance duties. Fund raising for childcare is allowed and encouraged on federal space but must still meet federal property requirements (see the fundraising guide). Recycle dollars are also a major source of childcare tuition assistance, as is the Combined Federal Campaign (CFC).

A PRACTICAL GUIDE TO FUNDRAISING FOR FEDERAL CHILD CARE CENTERS

March 1992

Prepared by
U.S. General Services Administration
Office of Child Care and Development Programs
Washington, DC
(202)501-3965

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PREFACE

Fundraising has become an important source of tuition assistance dollars for many Federal child care centers. We hope this document will take the mystery out of fundraising and will serve as a practical guide for boards of directors, parent advisory committees, and other volunteers.

We purposely exclude information on grant writing, soliciting corporations, and the Combined Federal Campaign, because information on these topics is available from other sources. Also, our discussion of legal considerations is necessarily general; centers are advised to consult their respective Federal agencies and buildings managers early in the fundraising process, even if events will be held off Federal property.

We welcome your comments about this guide and suggestions for fundraisers so that we can include them in future publications.

ACKNOWLEDGEMENTS

GSA wishes to acknowledge the contributions of Marcelle Hababion, Ph.D., Department of Veterans Affairs; Edwardene Pitcock, Department of Agriculture; and the directors and board members of child care centers operating in GSA managed space who provided proven fundraising ideas. The principal authors are Patricia F. Kinney, Ph.D, and Susan Grandy, Intern, Office of Child Care and Development Programs.

UNITED STATES
OFFICE OF PERSONNEL MANAGEMENT
WASHINGTON, D.C. 20415

January 24, 1992

MEMORANDUM FOR HEADS OF DEPARTMENTS AND AGENCIES

FROM: CONSTANCE BERRY NEWMAN
DIRECTOR

SUBJECT: Special Solicitations for Child Care Centers Located at Federal Installations

Because the Federal Government has recognized the importance of appropriate child care benefit programs, many child care centers have been established at Federal installations. These centers provide accessibility to child care to increasing numbers of Federal employees. However, many child care facilities are now faced with the dilemma of how to maintain quality care at an affordable price.

Accordingly, many centers have applied for and received eligibility in the Combined Federal Campaign (CFC). However, some have requested permission to conduct additional charitable fundraising efforts outside of the CFC.

While Section 950.102 of the CFC regulations at 5 CFR Part 950 limits fundraising in the Federal workplace to the annual CFC, there is an exception to this limitation on solicitations that applies to child care centers. Section 7 of Executive Order 12353 (as amended) allows Solicitations conducted by organizations composed of civilian employees or members of the uniformed services among their own members for organizational support or for the benefit of welfare funds for their members. Such solicitations shall be conducted under the policies and procedures approved by the head of the Department or agency concerned.

We have determined that child care centers located at Federal installations fall within this exception and, therefore, may conduct special solicitations on their

behalf under the policies and procedures approved by the head of the Department or agency concerned. In undertaking such a solicitation, the Department or agency's standards of conduct and any restrictions of the Office of Government Ethics regarding fundraising should be reviewed carefully. Nothing in this memorandum is intended to limit the opportunities for child care centers to seek support from non-Federal sources, from Federal employees outside the workplace, or to limit the opportunity for a Federal employee in a private capacity to support the centers.

In conformity with the Office of Personnel Management's longstanding position that other charitable solicitations should not be conducted during the CFC, we are requesting that such solicitations not take place during the fall of each year when the local CFC's are in progress.

SECTION 1
WHY FUNDRAISING?

Recent studies have shown that quality child care is expensive, and center-based care is generally the most expensive. Annual estimates from quality centers range from $4,800 for preschoolers to over $10,000 for infants. While these costs vary in relation to center size, staffing patterns, and geographic location, quality child care will always be expensive, even prohibitive to many families.

Under provisions of the Trible Amendment (40 U.S.C 490b), Federal agencies are authorized to provide space for child care centers for Federal families without charge for rent or services.[1] Even with operating costs thus reduced, the cost of onsite child care remains high and, for some Federal families, unaffordable.

Costs remain high, because the major expense for child care centers is staff salaries and benefits, which cannot be paid with appropriated funds. Child care centers depend primarily on parent-paid fees for staff salaries and benefits. Salary costs are related to specific staff-to-child ratios for good care. For example, infants generally require nearly three times more staff than preschoolers. In addition, quality care requires recruiting competent, well-trained staff and retaining them with good salaries, benefits, and working conditions. Where child care is inexpensive, a direct link exists between low staff salaries and high staff turnover. Inferior care for children is the direct result.

A major goal for Federally sponsored centers should be to increase the affordability of onsite child care for as many Federal families as possible by providing tuition assistance.

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[1] 'Services' includes utilities, office furniture and machines, child-sized furniture and equipment, kitchen appliances, telephone system and service, and security systems.

Fundraising is the major mechanism for raising tuition assistance dollars.

The success of fundraising within an agency is inextricably linked to the sponsoring agency's view of the center and of child care as a whole. Agency employees will be more likely to support a center's fundraising if they support the center's program, value its mission, believe it provides a valuable service to Federal employees, and believe that dollars raised will directly benefit families who otherwise might not be able to afford an agency's onsite child care.

Word of mouth about a center will play a major role in developing positive perceptions among agency employees. To develop and maintain agency support, the center must provide a high-quality program, advertise its mission and program, and maintain constant, positive visibility.

Parent and public education is critical to gaining support for fundraising. A board that actively promotes a center has the opportunity to increase public awareness of onsite child care as a viable option for families. Public perceptions will directly affect the support--or lack of support--for all fundraising efforts. **Remember: agency employees are willing to support quality programs that promote laudable goals.**

SECTION 2
LEGAL CONSIDERATIONS

A child care center, through its board of directors or Parent organization, can conduct a wide range of fundraising activities on and off Federal property if the activity meets certain criteria and if certain procedures are followed. In this section, different types of fundraising events authorized on Federal property, advertising, permitting, and certain IRS requirements are discussed.

AUTHORIZED FUNDRAISING ACTIVITIES

The Public Buildings Cooperative Use Act of 1976, 40 U.S.C 601(a), authorizes fundraising in public areas on Federal property--auditoriums, cafeterias, lobbies, foyers--during and after working hours if the activities can be classified as one of the following:

- Cultural: film, drama, dance, musical, and fine arts programs.
- Educational: library operations, lectures, demonstrations.
- Recreational: athletic events.

Examples of fundraising activities allowable on Federal property include art auctions, talent shows, film presentations, fashion shows, concerts, plays, lectures, dance recitals, book sales, walk/run events (1K, 5K, 10K), "celebrity" athletic events, and sports tournaments.

Certain fundraising activities do not fit the definition of a cultural, educational, or recreational activity, but are allowable on Federal property if cosponsored by an employee association or group. Examples include bake sales, jewelry sales, t-shirt sales, employee fairs or bazaars, cookbook sales. Employee associations and agency volunteer committees can be valuable resources for child care center fundraising activities.

Section 101-20.306 of the Federal Property Management Regulations (FPHR)(41 C.F.R. 101-20.306) prohibits gambling on Federal property. Gambling includes lotteries, pools, and raffles. To have an event of this type, center parents, board members, and staff would have to sell tickets and hold lotteries, pools, or raffles off Federal property. They are expressly prohibited from selling tickets on Federal property or soliciting Federal employees while on their jobs.

FPMR Section 101-20.307 prohibits the use of alcoholic beverages, except "upon occasions and on property upon which the

head of the responsible agency or his or her designee has for appropriate official uses granted an exemption in writing. Contact your agency management and building manager or landlord for guidance before planning a fundraising event at which alcoholic beverages would be served.

ADVERTISING ON FEDERAL PROPERTY

A child care center may advertise its fundraising events on Federal property even if the event itself will be held off Federal property. It may advertise the event by displaying fliers, pamphlets, or posters on authorized bulletin board. or distributing materials in Federal building public arena. A permit generally is not required for displaying materials on authorized bulletin boards. Again, consult your agency management and building manager for guidance.

To distribute materials in public parts of General Services Administration (GSA)-controlled buildings, the center must obtain a permit from the buildings manager pursuant to FPMR 101-20.4. Centers in non-GSA space should contact their respective buildings manager for proper procedures.

PERMITTING

A child care center intending to conduct a specific fundraising event should contact the buildings manager well in advance for specific permitting instructions. For each fundraising event held on GSA-controlled property, child care center representatives must file a permit application with the GSA buildings manager (pursuant to FP~R Section 101-20.401). The application requires the following information:

1. Full name, mailing address, and telephone number of the applicant; the organization sponsoring the proposed activity; and the individuals responsible for supervising the activity.

2. Documentation showing that the applicant has authority to represent the center.

3. A description of the proposed activity, dates and times during which it is to be conducted, and the number of persons expected to be involved.

Further, the center will be required to submit a signed statement that:

1. The applicant is a representative of and will be soliciting funds for the sole benefit of the center.

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2. The fundraising organization has received an official ruling of tax-exempt status from the Internal Revenue Service under 26 U.S.C 501 or, alternatively, that an application for such a ruling is still in process.

   If the fundraising organization does not have nonprofit status, it cannot use Federal property for fundraising unless:

   - The child care center vendor is incorporated and certified as a tax-exempt organization, or
   - The fundraising organization affiliates with an employee organization, which could accept and disburse funds on the center's behalf.

IRS REQUIREMENTS

Certain IRS regulations apply for nonprofit organizations conducting fundraising activities. Your tax consultant or account can provide information pertinent to your center's situation.

The IRS requires fundraising sponsors to tell donors how much of their donation is tax deductible--the portion of the donation that actually benefits the center. This means that the cost of food, beverages, or to gifts received in return for the donation must be subtracted from the donation amount and must not be claimed as a tax deduction. Several general rules apply:

- The cost of raffle tickets (which may not be sold on Federal property) is not tax deductible--the donor is purchasing the right to win something, which is not considered a donation.
- IRS generally rules that if a donor pays at least $25 and receives a token (t-shirt, coffee mug) costing less than $5 in return, the full $25 is considered a tax deduction.
- Generally, if the price of a fundraising item represents its fair market value, such as a cookbook, no part of the purchase price is considered tax deductible.

Child care centers contemplating fundraising activities might want to consult two IRS publications for details:

- Publication No. 557, Tax-Exempt Status for Your Organization

- Publication No. 1391, Deductibility of Payments Made to Charities Conducting Fund-Raising Events

Call IRS—(800)829-3676—to order copies.

SECTION 3
STEPS TO FUNDRAISING SUCCESS

Fundraising for child care can be rewarding, profitable, and fun! The keys to success are clear goals and an organization and volunteers who believe in the mission of the center and the fundraising purpose.

This section describes a step-by-step approach to successful fundraising. These steps are:

1. Set goals
2. Choose events and assess feasibility
3. Assign responsibility
4. Conduct your event
5. Evaluate the event's success
6. Provide feedback and thank participants

1. SET GOALS

Setting 1- and 5-year goals will help you decide how much effort you need to devote to fundraising and which activities will be most appropriate. Planning ahead also allows you to capitalize on past successes--and avoid the not-so-successful events. To help you set goals, ask yourselves:

- How much do we want to raise? Is it feasible? Consider the talents, experience, availability, and numbers of your volunteers and your center's fundraising track record. Be realistic.

- What will we use the money for--will our volunteers be excited about this purpose? Volunteers and contributors are more likely to want to participate in fundraisers for things like tuition assistance, training, or enrichment programs than for reducing overhead or building a contingency fund: tuition assistance should be the primary goal. Be thoughtful and explicit, and let your purpose be well known.

- Can we repeat successful past events? Or do we need something new? Repeat your past successes, even the small ones--you can reduce your planning time, costs, and risks. Learn to recognize a "tired" event and avoid repeating it.

2. CHOOSE EVENTS AND ASSESS FEASIBILITY

Select several possible events and assess feasibility before choosing one. Sample fundraising events are described in the appendix. Review the following for each event:

- Estimate the amount of profit the event will produce. One big event usually requires more upfront money but may be worthwhile in the revenue it produces for the effort required.

- Assess the amount of time, money, and human and physical resources the event will require. Assess the willingness of volunteers to work on such an event. Determine if the goal of the event is reasonable given the available resources.

- Consider whether volunteers will enjoy working on the event. Many fundraisers attract numerous volunteers because it is widely known that the volunteers have fun during planning.

- Consider your organization's nature or culture when choosing an event. Ask whether the event is appropriate for the potential audience.

- Determine if the event is well timed. Avoid conflicts with other organizations. Try to link the event to special events such as Public Service Recognition Week, Black History Month, and other agency activities.

- Identify individuals who have had experience in their churches or communities with other fundraisers. They may be willing to conduct the same fundraiser for your organization.

3. ASSIGN RESPONSIBILITY

Once goals are set, you are ready to assign fundraising responsibility. You may use:

- The full board
- A fundraising committee responsible for all events
- A committee appointed for one event

You may want to assign long-range planning responsibilities to the full board, but divide short-term responsibilities by event. Remember that the primary role of center directors and staff is caregiving--not fundraising. They are appropriately involved in fundraising only as far as the

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children are involved. If the fundraising event is a holiday pageant or puppet show, director and staff involvement is appropriate.

Annual events that are successful tend to be anticipated by the Federal community. You may want to plan one annual, repeat event that will be anticipated every year, such as selling holiday giftwrapping paper every November. A few smaller events could then vary year to year. Avoid planning numerous small events, however--you will wear out your welcome with volunteers and supporters!

Remember to delegate! If everyone does a little, no one does a lot.

4. CONDUCT YOUR EVENT

As you plan, organize, and conduct your event, keep the following in mind:

- Early contact with your buildings manager is critical. Buildings managers can help with a number of things, including timing, agency requirements, and set up for complicated events.

  Timing: Buildings managers normally maintain annual agency calendars and can help you make wise scheduling decisions. With early review of the agency calendar, you can time your bake sale to avoid conflicting with similar events. You may also capitalize on complimentary events, such as selling pizza slices at the same time another group is having a book fair.

  Agency Requirements: Buildings managers can also help assure full compliance with building requirements, and you can avoid last-minute surprises. For example, permits are required for fundraising events held on GSA-controlled property; see the discussion of permitting in Section 2. Check with him or her before making time and money commitments.

  Event Set Up: Buildings managers often are experienced in successfully setting up complicated events, like auctions or large book fairs. Capitalize on this experience.

  A supportive buildings manager is an important asset; a good relationship is worth cultivating.

- Involve agency leadership. Before you set dates, check with agency management for scheduling conflicts. Invite your agency director to buy the first poinsettia for your annual sale or sell chili at noon. Remember to take pictures for future publicity! Also, contact your agency's national and regional leadership for information about visiting dignitaries. Top management support offers a tremendous opportunity for increasing center visibility and advertising fundraising events.

- Provide clear and simple directions to all volunteers. Hold an organizing committee meeting initially to assign tasks; avoid having too many meetings. One month before the event, hold a status meeting to share what has been accomplished and what needs to be done. Just before the event, hold a final meeting so that all directions are clear and last-minute details can be addressed.

- Keep clear and accurate records. These are invaluable as you evaluate your event's success and plan for future events. Include specifics: telephone numbers, problems, key volunteers, recommendations.

- Advertise aggressively. Use eye-catching well-written materials that explicitly state who is sponsoring the event, what is planned, and the event's purpose (who or what will benefit). If funds are to be used for tuition assistance, let it be known that your goal is to increase the number of families that will benefit.

  Advertise in your agency or employee association newsletter, and notify your agency's volunteer committee. Look for creative advertising sources: bulletin boards outside your building, other centers, private companies. Some children enrolled at the center may be from non-Federal families. Be sure to send annouuncements of upcoming events to their parents' employers.

  As you advertise, remember that your materials also advertise your center--take advantage of opportunities to display your center's logo, include photographs of children in action, or briefly highlight your program. Use all

opportunities to enhance your center's visibility.

- Involve agency volunteer committees or employee associations. They probably have fundraising experience and may even offer to help or let your center participate in their events.

- Collect money before giving out merchandise. This will reduce your risks and eliminate embarrassing collect) on efforts on the part of your volunteers.

- Take photographs. Pictures of key parts of the event are useful for publicizing future events or thanking contributors and volunteers.

- Keep careful records of money spent and received. You may want to consider separating accounting duties to avoid one person having too much responsibility. For example, a volunteer selling tickets to an event would submit a written account of money received, a second person would receive and verify the amount, and a third person would deposit the money.

5. EVALUATE THE EVENT'S SUCCESS

Take time after your event to evaluate its success. Put your comments in writing--be brief. Include details you think may be useful in the future: telephone numbers, dollars spent and earned, problems, key volunteers, and recommendations. In evaluating your event, consider these questions:

- Did volunteers and contributors have a good time?
- Did you raise as much money as you hoped
- Was the effort expended worth the benefit received?
- Do you recommend repeating the event? If so, what would you do differently? If not, why?

This kind of information can be extremely valuable to future event planners as they decide how to most effectively use their available resources.

6. PROVIDE FEEDBACK AND THANK EVERYONE

Let your volunteers and contributors know how they did! You might consider preparing follow-up posters to let everyone know how much money was raised, what it was used for, how many donuts were sold, or how many people attended your wine-tasting party. Write a brief article highlighting the event for your agency or employee newsletter. People will be more inclined to participate in future events if you take time to provide feedback. These opportunities for feedback have the secondary benefit of positively enhancing your center's visibility. If you want to share your success and your ideas, send an article to the Office of Child Care and Development Programs' SHAPE newsletter.

Thank your volunteers and contributors. Try to be as personal as possible with key persons--handwritten notes from the board president or fundraising committee chair, children's artwork accompanied by their thanks, and/or telephone calls. Although ambitious, you may consider compiling a computer mailing list of all contributors and sending each a letter.

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